



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of LCS Services, Inc., North Mountain Sanitary Landfill
Inspection Date(s): March 6, 2025
Regulatory Program(s): SIP, CAA Title V, NSPS and MACT

Company Name: LCS Services Inc.
Facility Name: North Mountain Sanitary Landfill
Facility Location: 911 Allensville Rd.
Hedgesville, WV 25427

Latitude: 39.573334 **Longitude:** -77.986111
County/Parish: Berkeley County

AFS/ICIS-Air Number: WV00000300036
Permit Number: R30-00300036-2021
NAICS Code: 562212 **SIC:** 4953
DSB ID #: ECAD - 5622

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Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at LCS Services, Inc., North Mountain Sanitary Landfill (LCS 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 February 18, 2025, via email. On March 3, 2025, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Ian McMillen, 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, located at 911 Allensville Rd., Hedgesville, WV 25427, received a CAA Title V permit (# R30-00300036-2021) from the West Virginia Department of Environment Protection (WVDEP) issued on July 6, 2021.

LCS is classified as a major source for Carbon Monoxide (CO) and a minor source for all other criteria pollutants. LCS 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 34 megagrams per year (Mg/yr) of Nonmethane Organic Compound (NMOC) emissions. 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 Part 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
- 40 CFR Part 63: Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

B. Inspection Opening Conference

At 09:00 AM on March 6, 2025, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. LCS was represented by Dylan See (EP Manager), Logan Robinson (Gas Technician II), John Wardzinski (District Manager), Ian McMillen (Operations Manager) and Steve Barten (EP Manager). Also, Joseph Kreger and Christopher Scanlan of WVDEP were present. EPA inspectors, Parmatma Adhikari, Dean DeLuca, Owen Ehret and Edward Owen, 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, LCS did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

The LCS is a municipal solid waste landfill that began operation in 1991 and is privately owned and operated by LCS Services, Inc., which is under the umbrella of Waste Management, Inc. The landfill accepts municipal solid waste, construction and demolition debris (excluding asbestos waste) and approved residual waste streams from nearby areas. LCS can accept up to 500 tons of waste daily, but typically receives around 400 tons. In 2024, the total amount of waste received at the Facility was 116,998 tons. LCS stated that all waste is delivered via residents or Waste Management's hauling truck fleet, and no waste is brought in via railcar. All waste is covered at the end of the day, and the Facility typically uses tarps as an alternative daily cover for dirt. LCS stated that the Facility tries to keep a small working area of 100'x100' for active waste deposition. The landfill gas generated by the decomposition of the waste is collected through vertical and horizontal wells and routed to a flare, where it is combusted before being vented into the atmosphere.

The landfill's regular hours of operation are from 7:00 AM to 4:00 PM, Mondays to Fridays, and 7:00 AM to 12:00 PM on Saturdays. There are eight full-time employees onsite each day. LCS stated that 67 acres of the 468-acre property are permitted as landfill. The landfill currently consists of ten stages (Stages 1A, 3, 4, 5A, 5B, 6, 7A, 7B, 8A, and 8B), and three stages (Stages 1B, 2A and 2B) will be built in the future and has a total design capacity of approximately 10.9 million cubic yards. Currently, about 10.2 acres are closed, with a High-Density Polyethylene (HDPE) liner on top and bottom. LCS stated about 170 vertical and horizontal wells in the landfill.

LCS operates two 100,000-gallon leachate pretreatment tanks. Leachate from the landfill is collected into the tanks and, after pretreatment, is transferred to a leachate discharge pond, which discharges directly to the Berkeley County Public Service Sewer District (PSSD). LCS stated that the Facility produces approximately 2,000 gallons of leachate daily; however, this amount can fluctuate based on precipitation.

The Facility does not have any underground tanks, but it does have nine above-ground storage tanks, including the two leachate pretreatment tanks. These are summarized below:

Tank Description	Size of Tank in gallons	Contents
Tank 1	8000	Diesel
Tank 2	500	On-Road Diesel
Tank 3	500	Gasoline
Tank 4	1000	Waste Oil
Tank 5	275	Hydraulic Oil
Tank 6	275	Motor Oil
Tank 7	275	Transmission Oil
Tank 8	100,000	Leachate for Pretreatment
Tank 9	100,000	Leachate for Pretreatment

LCS stated that there is no emergency generator or any other combustion sources at the Facility. LCS is not currently required to have an active gas collection system and control device installed based on their NMOC emissions; however, they have voluntarily installed such a system for odor control purposes. LCS has an elevated, non-assisted flare with a rated capacity of 2,360 scfm to combust the landfill gas for odor control. The flare was installed in 2019.

The opening conference concluded at 10:17 AM

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:22 AM by Dylan See, Logan Robinson, John Wardzinski, Ian McMillen and Steve Barten of LCS and Joseph Kreger and Christopher Scanlan of WVDEP also present for the walkthrough. EPA inspectors noted photos would be taken and a Forward Looking Infrared (FLIR) camera would be used during the Facility walkthrough (Attachment 2).

The inspection team was first led to the flare station. At the time of the inspection, the flare was operating, and the EPA inspectors noted the following parameters: vacuum at 43.06 inches, flare temperature at 1,035 °F, pilot temperature at 487.45 °F, flare flow at 800 standard cubic feet per minute (scfm), and a total current daily flow of 535,738 scf (from midnight until the time of inspection). When the EPA inspector asked about the methane concentration in the landfill gas, Logan Robinson mentioned that the concentration from the previous week was 42 parts per million (ppm). The inspection team used a FLIR camera to observe the flare for any unburned hydrocarbons emitted from the flare. Other than a heatwave emanating from the flare, EPA did not observe unburned hydrocarbons from the flare.

After observing the flare station, the inspection team proceeded to the closed and capped area of the landfill to observe the cover integrity. The EPA inspector also used a FLIR camera to monitor gas wells for potential leaks. Next, the inspection team observed the leachate sump area, where leachate is collected and managed to prevent groundwater contamination. Following the observations of the

leachate sump, the inspection team visited the maintenance shop. LCS employs full-time mechanics in the maintenance shop who work from 7:00 AM to 4:00 PM, Monday through Friday, and are responsible for the general maintenance of operational equipment and fleet vehicles.

In the maintenance shop, the inspection team observed two Miller Metal Inert Gas (MIG) welders and a Crystal-Clean part washer. LCS mentioned that the only aqueous combination solvent used, and Crystal Clean handles the recycling of the waste generated.

The inspection team proceeded to observe the leachate treatment area. The inspection team first examined the leachate holding pump and two 100,000-gallon leachate pretreatment tanks in this area. After undergoing biological pretreatment in the leachate treatment tank, the leachate is stored in the holding pump before being discharged to the Berkeley County Public Service Sanitation District (PSSD).

The walkthrough concluded at 11:45 AM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 11:45 AM. EPA inspectors reviewed documents requested in the March 3, 2025, email to Ian McMillen (see Attachment 1).

Records were provided at the time of the inspection by Steven Niehoff (Director of Air Programs).

Below are the records requested and what was provided:

1. Facility plot plan which depicts the entire landfill surface and the existing gas collection system;
2. Site map showing all of 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, include copies of any Tier II site specific testing;
8. Provide a record of the Facility's actual annual air emissions, from January 1, 2020 through December 31, 2023, for all regulated air pollutants (NO_x, SO_x, CO, VOCs, HAPs, and PM);
9. Provide a listing of all flare, generators, emergency generators and all other combustion sources. For each combustion unit onsite provide:
 - a. The make and model;
 - b. The date of installation;
 - c. Size or rating (MMBtu/hr, HP, kW, etc.);
 - d. Fuel combusted monthly since 2020 to present (gallons, MMcf, etc.);

- e. Provide any temperature or flow monitoring records for the existing flares since January 1, 2020.
- 10. Copies of any performance tests conducted on any source to determine emission rates, concentrations or compliance since 2015;
- 11. Records of monthly wellhead pressure, temperature, Nitrogen or Oxygen monitoring since January 1, 2020 to the present;

During the record review process, the inspection team went through each question, and the facility confirmed that all information was ready to upload. Steven Niehoff provided all requested information on March 14, 2025, through “GoAnywhere”, a secure file transfer site.

V. Closing Conference

After the records review, EPA inspectors, WVDEP inspectors, and Dylan See, Logan Robinson, John Wardzinski, Ian McMillen and Steve Barten of LCS had 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 12:35 PM.

The EPA did not notice any specific area of concern with LCS during the inspection, but EPA is still reviewing the data thoroughly and may come up with further questions.

VI. List of Attachments

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