

The background of the slide is a microscopic image of plant cells, showing a network of cell walls and large, clear vacuoles. A semi-transparent teal rectangle is overlaid on the left side of the image, containing the text.

Why We Do
What We Do!

Air Regulations

How this all started



Hardy Road Landfill (1984)

- It took 4 minutes for the Fire Department to respond, house was already gone.
- 10 were evacuated
- 11 Lawsuits were filed

Regulatory Divers

- Clean Air Act of 1963
- Clean Air Act Amendments of 1990
- NSPS/EG WWW for Municipal Solid Waste Landfills final rule 1996
- NSPS Subpart XXX for Municipal Solid Waste Landfills that commenced Construction, Reconstruction or Modification After July 17, 2014 Final Rule August 29, 2016
- Federal Plan OOO for Municipal Solid Waste Landfill that commenced construction on or BEFORE July 17, 2014 Effective date June 21, 2021
- NESHAP AAAA: Municipal Solid Waste Landfills revised and effective September 27, 2021
- State specific plans??????

NSPS WWW

- Required sites to monitor all wells for oxygen , temperature and pressure monthly
- Wells with oxygen >5%, positive pressure or temperature above 131 F were required to complete a corrective action within 5 days, correct the deviation within 15 days or expand the well field within 120.
- Required Surface Emission Monitoring
- Does not apply to any sites

NSPS XXX

- Applies to sites that “commenced construction” to an expansion after July 17, 2014
- Was supposed to “fix” WWW
- Lowered applicability to 34 Mg NMOC
- Requires monitoring for oxygen, pressure, and temperature. Only has compliance limits for temperature and pressure.
- Introduced Root Cause Analysis
- Specifically required surface emission monitoring (SEM) around penetrations.
- If site did leachate recirculation, must do annual report.

Federal Plan - OOO

- Became applicable to existing sites June 21, 2021 where the state had not implemented a plan for “existing sites”.
- Lowered applicability to 34 Mg of NMOC
- Administrated by EPA – Most states have not been delegated authority
- Requires monitoring of oxygen, temperature and pressure at each well monthly. Regulatory standards only for temperature and pressure.
- Requires Root Cause forms over 15 days
- Requires quarterly surface emission monitoring including penetrations
- If site did leachate recirculation, must do annual report.

NESHAP AAAA

- Originally only required SSM plans and reporting (01/16/04)
- Revised in 2020 to include other monitoring and recordkeeping requirements and got rid of SSM plans and forms
- New Regulatory well head temperature of 145 F
- Applicability is currently 50 Mg NMOC (conflicts with OOO/XXX)
- Requires monitoring of oxygen, pressure, and temperature monthly. Regulatory requirements only for pressure and temperature.
- Requires quarterly surface emission monitoring (include protrusions)
- Requires CO sampling for wells over 145 F within 7 days if the well does not have HOV

NESHAP AAAA continued

- Requires reporting within 24 hours if a well is over 170 F (without an HOV) and 1000 ppm CO. Must take CO sample even if it goes below 145 in 7 days.
- Requires annual down hole temperature monitoring if well is over 165 F.
- Root cause forms are required for wells with positive pressure or temperature over 145 F for more than 15 days.
- Most landfills are now subject to this rule

AAAA Applicability

- Design capacity greater than 2.5 million cubic meters.
- NMOC concentration of >50 Mg (this is going to be changed to 34 Mg to be consistent with OOO).
- If your initial design capacity shows you are >34 Mg you can use the Tiers to get site specific information. The site specific information may lower your NMOC emission rate.
- Most sites stop at Tier 2 (site specific NMOC).
- Must redo Tier 2 every 5 years.

Well Field Sampling Requirements

Well Head Monitoring

- Must monitor for oxygen, pressure and temperature.
- If a well is over 145 F for more than 7 days and you don't have an HOV, must sample for CO.
- VERY SPECIFIC laboratory method for sampling CO. MUST use ALT-145 for bags. Must follow all leak check procedures.
- If temperatures exceed 165 F, site must do down hole temperature monitoring annually
- If temperatures exceed 170 F and have $\geq 1,000$ ppm CO, you must report to the administrator within 24 hours. CO sample should be obtained as soon as the monitored temperature is over 170 F.

Surface Emission Monitoring

- Follow a serpentine pattern 30 meters in spacing between legs.
- Monitor all penetrations (only a penetration if it goes into the waste mass.
- Remonitoring follows same timelines as WWW (10 day, 2nd 10 day, 1 month, 1 month+10 day)
- Report exceedances in GPS coordinates with at least 5 decimal places.

Root Cause Forms

- To be filled out if the well is positive pressure or has a temperature over 145 F or well HOV for more than 15 days. Need to be included in your semi-annual NESHAP report if the exceedance is not corrected within 60 days.
- Each site has own forms.

Reporting

- Check your Title V for state specific requirements (i.e. Michigan is due March 15 and September 15. Ohio has quarterly deviation reporting)
- NO MORE SSM REPORTS!!!!!!!!!!!!
- Semi - Annual reports required under OOO/XXX/AAAA (Michigan is due March 15 and September 15).
- Annual liquids addition report (due date depends on when the initial was submitted)
- Annual certification as required by your Title V. Michigan is due March 15.

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