UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 13 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Laura Niemann
Environmental Information Logistics, LLC
130 E. Main Street
Caledonia, MI 49316

Dear Ms. Nieman:

We have evaluated your request in the letter dated March 4, 2008, in which you ask permission to use alternative test procedures for determining fuel gas heat content and visible emissions for nine passive flares at the Pitsch Sanitary Landfill in Ionia County, Michigan. The landfill is subject to 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. Within these requirements, open flares are required to have their fuel gas net heating value determined from three 30-minute Method 3C samples, and their visible emissions determined over 2-hour periods using Method 22.

You are proposing to shorten the Method 3C requirement to a single 30-minute test supplemented by two methane readings from a hand-held combustible gas meter, since the nine flares will be combusting similar landfill gas. You also propose to reduce the required 2-hour visible emissions test using Method 22 to 30 minutes per flare. You note that landfill gas combustion is similar to natural gas combustion and should not result in visible emissions.

We believe your request to shorten the Methods 3C and 22 testing times as described above is justified. We therefore approve your request to use these alternative procedures at the Pitsch Sanitary Landfill in Ionia County, Michigan. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at http://www.epa.gov/ttn/emc/approalt.html for use by other interested parties.

If you have questions or would like to discuss the matter further, please contact Foston Curtis at (919)541-1063, or you may e-mail him at curtis.foston@epa.epa.gov.

Sincerely,

Connie Oldham

Conniesue Oldham, Ph.D, Group Leader
Source Measurement Technology Group

cc: Foston Curtis, E143-02, RTP
Jeff Gahris, Region 5
Terry Madden, Michigan DEQ