



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

MAR 31 2011

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

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

Dear Ms. Niemann:

In your March 24, 2011 correspondence, you asked permission to use an alternative test procedure to determine nonmethane organic compounds (NMOC) from the Wexford County Landfill in Manton, Michigan. The landfill is subject to 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, and must test to determine if its NMOC emissions are greater than 50 megagrams per year.

The affected landfill consists of approximately 43 acres, and you propose to collect 35 samples. Under Tier II of Subpart WWW, two Method 25C samples are collected per hectare of landfill area for determining NMOC. You propose to collect samples from the landfill using a combination of Method 25C probes and in-place leachate cleanout risers and gas test wells. You submitted diagrams showing the locations of the risers and wells and where the Method 25C samples will be taken. The risers and test wells are located along the periphery of the sloped exterior sides of the landfill, and horizontally traverse the waste. They are also adjacent to areas of old waste under a synthetic liner that has been covered with newer wastes. These alternative locations would allow for sampling under the liner without having to puncture it with long probes.

This proposal to use the leachate vents and gas wells to collect NMOC samples is acceptable for Tier II testing at the Wexford County Landfill in Manton, Michigan. We believe this testing alternative produces samples that are at least as representative as those taken from Method 25C probes. 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 call Foston Curtis at (919) 541-1063, or you may e-mail him at [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov).

Sincerely,

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

cc: Foston Curtis (E143-02)  
Rob Dickman, MI DEQ  
Jeff Gahris, Region V