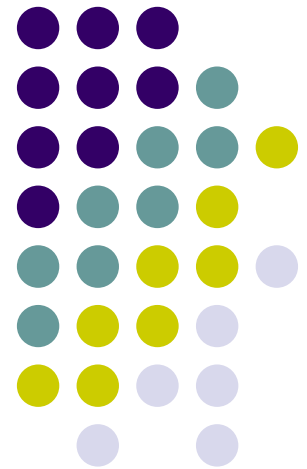
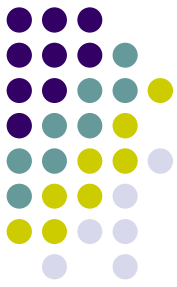


Status of MSW Landfill Amendments

Presentation for 11th Annual
LMOP Conference and Project
Expo
January 10, 2008



Overview



- Background
- Synopsis of Proposal, Comments, and Options
- Next Steps

Amendments Proposed on September 8, 2006



- Standards of Performance for Municipal Solid Waste Landfills, Part 60, Subpart WWW
- Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills, Part 60, Subpart Cc
- Federal Plan Requirements for Municipal Solid Waste Landfills that Commenced Construction Prior to May 30, 1991 and Have Not Been Modified or Reconstructed since May 30, 1991 (Landfills Federal Plan) Part 62
- National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills, Part 63, Subpart AAAA



Purpose of the Proposal

- NSPS, NESHAP, FIP, EG: Definition of owner/ operator and allocation of compliance responsibilities
- NSPS: Clarification of what constitutes treated LFG
- NSPS and NESHAP: Revisions regarding startup, shutdown, malfunction, and routine maintenance

Definition of Owner/ Operator and Allocation of Responsibilities



- Mandatory division of responsibilities between landfill owner/ operator and gas collection, control, or treatment system operator
- Entities under common control would be responsible for compliance with all rule requirements
- Compliance responsibilities when entities cease to accept LFG



Treated Landfill Gas

- Specific requirements for moisture removal
- Requirement to use treated LFG as a fuel
- Treatment systems with prior approval would have 1 year to comply with new treatment requirements
- Installation of instrumentation for continuous monitoring
- Opportunity for approval of other site-specific monitoring parameters
- Record 24-hr block averages

SSM and Routine Maintenance



- Removal of 1-hour/5-day provision
- 3-hour averages would have to be recorded and all deviations reported



Other Issues

- Requested comment on how to address areas that do not meet criteria for removal of controls
- Requested comment on surface monitoring requirements
- Requested comment on provisions for de facto design plan approval



Next Steps

- EPA internal workgroup meetings currently in progress
- Amendments projected to be finalized during the first quarter of 2008