

Alternative Timeline Requests for Correcting an Exceedance of Temperature, Oxygen or Nitrogen, or Positive Pressure at Landfill Gas Collection Wells

What is the Purpose of this Guidance Document?

Standards of Performance for New Stationary Sources (NSPS) 40 C.F.R. §60.755(a)(3) states in part:

“If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under §60.753(b). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”

LANDFILL NSPS §60.755(a)(5) states in part:

“If a well exceeds one of these operating parameters [temperature, and oxygen or nitrogen], action shall be initiated to correct the exceedance within 5 calendar days. If the correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the administrator for approval.”

This guidance document is intended to describe how the owner or operator of a municipal solid waste (MSW) landfill, subject to the municipal solid waste new source performance standards (NSPS), may request an alternative timeline for correcting the exceedance or malfunction of a landfill gas extraction well that has exceeded the regulatory operating parameters for temperature, oxygen or nitrogen, and/or is operating under positive pressure.

When would an owner or operator need to request an alternative timeline?

In accordance with §60.755(a)(3) and (a)(5), the owner or operator shall monitor each well monthly for pressure, temperature AND oxygen OR nitrogen, and maintain each wellhead as provided in §60.753(b) and (c). If a wellhead measures a positive pressure, equals or exceeds a temperature of 55° C (131° F), or is measured with a nitrogen level equal to or greater than 20% or an oxygen level equal to or greater than 5%, and the owner or operator cannot correct the exceedance or positive pressure within 15 calendar days, but does not believe that expansion of the well field is necessary, then requesting an alternative timeline to complete other corrective measures may be appropriate.

What information needs to be included in a request for an alternative timeline?

Each request for an alternative timeline will likely be unique. Therefore it is difficult to prescribe what information should be included in the request. The general information that should be submitted with any alternate timeline request may include:

- the operating parameter that has exceeded the regulatory limit;
- the date that the exceedance was initially detected;
- a narrative discussion of the steps taken to correct the exceedance, including a description that explains why the exceedance could not be corrected within 15 calendar days, and how and by when will it be corrected;
- a summary of the historical data for the well in question (summary should include a minimum of six months of past data, construction specifications for the well, description of the cover in the area, the age and type of waste, leachate level in the well, and any other information pertinent to the well);
- the following data, collected at the well head:
 - the temperature of the landfill gas;
 - the percentage of the landfill gas that is methane;
 - the percentage of the landfill gas that is oxygen;
 - the percentage of the landfill gas that is CO₂;
 - the gauge pressure;
- a narrative discussion of the intended corrective measure and the amount of time that the owner or operator estimates it will take to accomplish the correction.

How will a request for an alternative timeline be evaluated?

Requests for an alternative timeline should be sent to the appropriate Ohio EPA, District Office (DO) or local air agency (LAA) of the Division of Air Pollution Control, (DAPC), and copied to the Division of Solid and Infectious Waste Management DO within 15 days of the date that the exceedance or positive pressure was initially detected. All requests will be evaluated based on the data submitted; additional information may be needed for review after submission of the 15 day initial request. Because of the individual nature of these requests Ohio EPA cannot give general approval guidelines for alternative timelines.

What will be required once DAPC has approved an alternative timeline?

Once an alternative timeline for correcting an exceedance of the well head temperature, the oxygen or nitrogen level, or positive pressure, has been approved, the owner or operator must correct the exceedance within the newly approved timeline. If the correction cannot be achieved within this timeline, the owner or operator must notify the appropriate DAPC DO or LAA and submit a written request (to the same offices initially notified) for the timeline to be extended (including the reason) before the approved timeline has expired. If it becomes apparent that the exceedance cannot be corrected it may be appropriate for the owner or operator to expand the well field or submit a demonstration for a higher operating value for temperature, oxygen, or nitrogen (see guidance).

[Please note: there is no regulatory program to approve positive pressure at a gas collection point, this condition must be corrected unless it meets the exceptions allowed per the rule (60.753(b)).]

For additional information regarding this document, please contact Cheryl Suttman at (614) 644-3617.

DISCLAIMER

This guidance is based on the NSPS, 40 CFR Subpart WWW as exists on October 4, 2010. The procedures set out in this document are intended solely for guidance of government personnel. The procedures are not intended and cannot be relied upon to create rights, substantive or procedural, enforceable by any party against Ohio EPA. While this guidance document is not legally binding, all statutes and rules referenced herein are binding and enforceable. Ohio EPA reserves the right to vary this guidance or to change it at any time without public notice and also reserves the right to deviate from this guidance on a case-by-case basis.