

**With Landfill Owners And
WDNR Bureau of Air**

Date: 11/8/05

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Goals of the Air / Landfill Workshop Include:

- Allow a forum for communication and understanding of the regulator and the regulated,
- Allow education of the air requirements at landfills,
- Allow education of the day-to-day practicality of operating a landfill and how it affects air permits,
- Allow identification of air issues that need more attention by landfill owners,
- Allow identification of permit language that is cumbersome or that needs clarification, and
- Allow a forum in which to follow-up on issues identified at the workshop.

Draft Agenda and Timeline for the Workshop

- 8:00 am Welcome and Explanation of Ground Rules – Mike Michels (Moderator)
- 8:15 am Introduction of Speakers – Moderator
- 8:30 am Overview of Wisconsin Air Rules as They Relate to Landfills – Steve Dunn (WDNR Permits) – invited, and Colin Duffy (WDNR Enforcement) - invited
- 10:00 am Break
- 10:20 am Overview of Landfill Operations as they Relate to Air – Chad Doverspike and Gerard Hamblin (Waste Management) - invited
- 11:45 am Lunch
- 12:30 pm Review of Air Issues at Landfills (see list that follows) – Various consultants summarizing the issue, presenting the landfill owner and WDNR perspectives, and encouraging discussion on the issue from the audience.
- 2:30 pm Break
- 2:50 pm Review of Air Issues at Landfills (see list that follows) – Various consultants summarizing the issue, presenting the landfill owner and WDNR perspectives, and encouraging discussion on the issue from the audience.
- 4:30 pm Wrap Up & Summary - Moderator

5:00 pm Adjourn

Review of Air Issues at Landfills

As many of these issues will be discussed as time will allow. Coordination with the Bureau of Air needs to occur in order to prioritize the issues.

Issue #1 – Wellhead Monitoring Issues

- Failure to maintain negative pressure at each wellhead. Readings were zero pressure; why is this non-compliance?
- Should horizontal LFG collectors and leachate cleanouts that are connected to active LFG extraction be subject to the wellhead operational standards (40 CFR 60.753(c))?
- The Landfill Owner does not plan to install a temperature monitoring device on each wellhead, instead the Landfill Owner plans to carry a portable temperature gauge to each wellhead, insert that gauge into a sample port on the wellhead, take the measurement, then extract the temperature gauge and carry it to the next wellhead for the next measurement.

Issue #2 – High Oxygen Concentration in LFG Wells

- How to seek alternate for a higher than regulated oxygen of 5%.
- May a LFG well be decommissioned or placed on an inactive list to accommodate for declining landfill gas generation thus declining flows?
- Discuss an inactive list and how the WDNR views this system.

Issue #3 – Winter Operation

- Frozen headers and valves due to low gas production
- Challenges of wellfield tuning – one change affect another – barometric pressure affects - others
- If high oxygen need to close the valve, if you close the valve it decreases flow, if you decrease flow valves freeze up from condensate in the winter, if valves freeze and blocks vacuum, then the well goes under pressure and you are out of compliance for pressure
- Frozen valves in winter, not practical to remove valve and thaw out in -20 degree wind chills

Issue #4 – Damage to the LFG Collection System

- Vacuum a problem at old landfill as landfill has settled and headers fill with condensate,
- Damage to wellheads which required wells to be closed creates exceedances
- HDPE pipe and some gas equipment not available within 120 days necessary to repair LFG collection system in a timely fashion.
- Cost of maintaining older gas system
- 4" flex tube wears quickly and is expensive

Issue #5 – Surface Emission Monitoring Issues

- Failing to Monitor Surface Emissions, Wellheads, and Other Items Soon Enough.
- Failing to Adequately Monitor The Landfill Sideslopes For Surface Emissions
- SEM done with WDNR on site, but WDNR asked that we not follow the 100' path in our plan. Why develop a plan if we are not going to follow it?
- Leaks from manhole structures
- Leaks near geomembrane boots on LFG extraction wells

Issue #6 – Control Device Issues

- Should not have to monitor the flare flow or temperature unless it is running
- Power failures and storms sometimes shut down equipment, Permit indicates must be up within 1 hour
- Failure to install and maintain a gas flow rate measuring device capable of recording the flow to the control device every 15 minutes. Is a continuous recorder that sums the totalized flow once per day allowed?
- USEPA determined that the Landfill Owner's compression and dehydration system qualified as a treatment device and, as such, exempts all engines or boilers that utilize treated gas from the requirements of monitoring. Discuss what notification the Landfill Owner must make to WDNR of this USEPA determination and what must be done to change the permit.
- Continuously monitoring temperature

Issue #7 – WDNR enforcement staff asking for more than what the permit requires

- Permit does not regulate for flow, but we are get non-compliance for not having flow at some wellheads.
- Consistency of regulators throughout the state with all landfills.

Issue #8 – General Issues

- Failure to report exceedances the next business day. What exactly is an exceedance versus a violation? Does the WDNR really want only violations reported or do they want every exceedance?
- Permits contain numerous conditions that are referenced to the federal new source performance standards. In some cases, the permit wording had been slightly changed from that of the NSPS. For example: Per NSPS, oxygen may be determined by method 3A or 3C. Many State permits do not include Method 3C. Why does the WDNR make these slight changes? Does WDNR intent to maintain the NSPS language? Is there any intent to change the meaning of the NSPS or are there any specific items from NSPS excluded purposely?
- Does the Landfill Owner only need to record the date and time when the landfill gas collection system is inoperable "for more than 5 days" and when the landfill gas treatment system and/or flare are inoperable "for more than 1 hour"? Recording every inoperable event, no matter how short, is considered unnecessary.