



August 12, 2016 Regulatory Update

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EPA Update to the NSPS for new landfills

Update to the EG's for existing landfills

July 15, 2016: Two final rules released by EPA.

(1) NSPS Rule: Applies to MSWLFs constructed, modified, or reconstructed after July 17, 2014 with a design capacity $> 2.5 \text{ MMg/Mm}^3$. Effective 60 days after publication.

Modification: increase in design capacity. Does not occur until owner begins construction on the expansion.

(2) EG Rule: Applies to existing MSWLFs with a design capacity $> 2.5 \text{ MMg/Mm}^3$. Requires states to update plans within 9 months to comply with new standards, and will be effective once plans are updated. Most existing landfills will be subject to the EG rule.

New Requirements

- Requires the installation of LFGCCS within 30 months of when NMOC emissions reach 34 Mg/yr (reduced from 50 Mg/yr).
- MSWLFs that close within 13 months of publication are still subject to the 50 Mg/yr standard.
- Requires compliance during startup, shutdown, malfunction (?).
- Requires electronic submittal of monitoring records to EPA. Added leachate recirculation to monitoring records.
- Quarterly monitoring of surface emissions. Includes perimeter of landfill, 30 m grid, and any cover penetrations.

Eased Requirements

- Allows for “Tier 4” demonstration between 34 and 50 Mg/year. Measured methane emissions < 500 ppm.
- Notice of design plan submitted to ADEQ, option for review.
- Allows for use of treated LFG for other purposes (e.g., boilers, CNG). Requires site-specific monitoring plan for treated LFG.
- No longer required to maintain O₂/N₂ levels (monitoring still required). Still requires corrective action with T > 55° C.
- New option for closed landfills to allow demonstration that LFGCCS cannot be operated for 15 years due to gas quality and that NMOC emissions are less than 34 Mg/yr.