

**This is the Flexible Group Landfill Template for 40 CFR Part 62, Subpart OOO - Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014, and have not been modified or reconstructed since July 17, 2014 which have actual non-methane organic compounds (NMOC) emissions of less than 34 megagrams per year.**

**This template is meant to be inserted into the ROP shell document along with the associated parts and appendices that are specific to this template.**

**Included is the emission unit name, description, and some instructions for Part C, the Emission Unit Summary Table. Other emission units may be needed for the ROP. The template requires the landfill to continually calculate its NMOC emissions and submit the results annually.**

**The requirements for operating the collection and control system for the landfill are not included in this table. If the facility enters the operational stage during the time of the ROP, it will have to comply with those applicable conditions of the Subpart including submission of an amended ROP application.**

**Blue text is guidance or notes on the use of the template. Delete all blue text prior to issuing the final permit or submitting it with a permit application. Read through all conditions. If this template is being used for an ROP Reopening or Renewal, and the conditions were established in a PTI, the appropriate footnotes which reference enforceability must be added to each applicable condition in the template.**

**Red text identifies options. Select the option that applies to the source and change the text to black. Delete red text that does not apply and renumber conditions if necessary.**

## C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, not applicable (NA) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

**{REMOVE ANY EMISSION UNITS THAT ARE NOT AT THE SOURCE OR ADD EMISSION UNITS THAT ARE AT THE SOURCE}**

### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Emission Unit ID | Emission Unit Description<br>(Including Process Equipment & Control Device(s))   | Installation Date/<br>Modification Date | Flexible Group ID |
|------------------|--|---|-------------------|
| EULANDFILL       | A Municipal Solid Waste (MSW) landfill that commenced construction, reconstruction, or modification on or before July 17, 2014, and has accepted waste at any time since November 8, 1987. The MSW landfill has a design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters, and actual NMOC emissions less than 34 Mg per year. This MSW landfill is subject to the requirements of 40 CFR Part 62, Subpart OOO. | {Use mm-dd-yyyy}                        | FGLANDFILL-OOO<34 |

## D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D, outlines terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

**{REMOVE THIS TABLE IF THERE ARE NO FLEXIBLE GROUPS}**

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Flexible Group ID | Flexible Group Description   | Associated Emission Unit IDs |
|-------------------|--|------------------------------|
| FGLANDFILL-OOO<34 | A Municipal Solid Waste (MSW) landfill that commenced construction, reconstruction, or modification on or before July 17, 2014, and has accepted waste at any time since November 8, 1987. The MSW landfill has a design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters, but actual NMOC emissions less than 34 Mg per year. This MSW landfill is subject to the requirements of 40 CFR Part 62, Subpart OOO. | EULANDFILL                   |

**FGLANDFILL-000<34**  
**FLEXIBLE GROUP CONDITIONS****DESCRIPTION**

A Municipal Solid Waste (MSW) landfill that commenced construction, reconstruction, or modification on or before July 17, 2014, and has accepted waste at any time since November 8, 1987. The MSW landfill has a design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters, but actual NMOC emissions less than 34 Mg per year. This MSW landfill is subject to the requirements of 40 CFR Part 62, Subpart 000.

Emission Unit: **EULANDFILL**

**POLLUTION CONTROL EQUIPMENT**

{Enter site specific pollution control equipment or NA}

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall determine the NMOC mass emission rate by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using procedures and calculations, as described in Appendices 5 and 7. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the appropriate AQD District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 62.16714(e)(1), 40 CFR 62.16718(a)(1))**
  - a. Upon completion of each Tier test, the permittee must compare the results to the NMOC mass emission rate standard of 34 Mg per year. If the results are equal to or greater than 34 Mg per year, then the permittee may perform the next higher tier test or submit a gas collection and control system design plan within one year as specified in 40 CFR 62.16724(d) and install and operate a gas collection and control system within 30 months according to 40 CFR 62.16714(b) and (c). **(40 CFR 62.16718(a)(2), (3) and (4))**
  - b. Tier 1 or Tier 2 NMOC emission results must be recalculated annually if the NMOC mass emission rate is less than 34 Mg per year. **(40 CFR 62.16718(a)(2) and (3))**
  - c. Tier 2 testing must be performed at least once every five years when being used to demonstrate the facility NMOC emissions are less than 34 Mg per year. **(40 CFR 62.16718(a)(3))**

- d. Tier 3 testing must be performed to determine a site-specific methane generation rate constant. **(40 CFR 62.16718(a)(4))**
  - e. Tier 4 testing to determine surface methane emissions, as described in Appendix 5, is allowed only if the permittee can demonstrate that NMOC emissions are greater than or equal to 34 Mg per year but less than 50 Mg per year using Tier 1 or Tier 2. If both Tier 1 and Tier 2 indicate NMOC emissions are 50 Mg per year or greater, then Tier 4 cannot be used. **(40 CFR 62.16718(a)(6))**
  - f. Tier 4 testing is allowed to demonstrate that surface methane emissions are below the standard of 500 ppm. Surface emission monitoring must be conducted on a quarterly basis. **(40 CFR 62.16718(a)(6))**
  - g. If there is any measured concentration of methane of 500 ppm or greater from the surface of the landfill, the permittee must submit a gas collection and control system design plan within 1 year of the first measured concentration of methane of 500 ppm or greater from the surface of the landfill according to 40 CFR 62.16724(d) and install and operate a gas collection and control system according to 40 CFR 62.16714(b) and (c) within 30 months of the most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 Mg per year based on Tier 2. **(40 CFR 62.16718(a)(6)(v))**
2. The permittee may use other methods to determine the NMOC concentration or a site-specific methane generation rate constant as an alternative to the methods required in Tier 2 (40 CFR 62.16718(a)(3)) and Tier 3 (40 CFR 62.16718(a)(4)) if the method has been approved by USEPA prior to submitting a test protocol to AQD. **(40 CFR 62.16718(a)(5))**

See Appendices 5 and 7

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee must calculate the annual NMOC emission rates using methods outlined in Appendix 7. **(40 CFR 62.16718(a)(1))**
2. Except as provided in 40 CFR 62.16724(d)(2), each MSW landfill subject to the provisions of 40 CFR 62.16714(e) must keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report that triggered 40 CFR 62.16714(e), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. **(40 CFR 62.16726(a))**
3. If the landfill is permanently closed, a closure notification shall be submitted to the appropriate AQD District Supervisor within 30 days, except for exemption allowed under 40 CFR 62.16711(g)(4). **(40 CFR 62.16714(e)(1)(ii)(B))**

### **OPTIONAL**

4. If reporting leachate or other liquids addition under 40 CFR 62.16724(l), the permittee must keep records of any engineering calculations or company records used to estimate the quantities of leachate or liquids added, the surface areas for which the leachate or liquids were applied, and the estimates of annual waste acceptance or total waste in place in the areas where leachate or liquids were applied. **(40 CFR 62.16726(j))**

See Appendix 7

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be received by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be received by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must submit the NMOC emission rate annually by March 15 for the previous calendar year following the procedure specified in 40 CFR 62.16724(j)(2), except as provided for in 40 CFR 62.16724(c)(3). Additional information may be requested as necessary to verify the reported NMOC emission rate. **(40 CFR 62.16724(c))**
  - a. The NMOC emission rate report must contain an annual or 5-year estimate of the NMOC emission rate calculated using the formula and procedures provided in 40 CFR 62.16718(a) or (b), as applicable. **(40 CFR 62.16724(c)(1))**
  - b. The NMOC emission rate report must include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions. **(40 CFR 62.16724(c)(2))**
  - c. If the estimated NMOC emission rate as reported in the annual report is less than 34 Mg per year in each of the next 5 consecutive years, the permittee may elect to submit, following the procedure specified in 40 CFR 62.16724(j)(2), an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report. This estimate must include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based must be provided. This estimate must be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate must be submitted. The revised estimate must cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate. **(40 CFR 62.16724(c)(3))**
5. The permittee must submit reports electronically according to 40 CFR 62.16724(j)(1) and (2) as follows:
  - a. Within 60 days after the date of completing each performance test (as defined in 40 CFR 60.8), the permittee must submit the results of each performance test. For data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at the time of the test, submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website, once the XML schema is available. For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test, submit the results of the performance test to the USEPA at the appropriate address listed in 40 CFR 60.4. **(40 CFR 62.16724(j)(1)(i) and (ii))**
  - b. Each permittee must submit reports to the USEPA via the CEDRI (CEDRI can be accessed through the EPA's CDX). The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 62.16724(j)(2))**
6. The permittee shall submit any NMOC test reports to the AQD, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

**OPTIONAL:** Use if the owner or operator of the affected landfill has employed leachate recirculation or added liquids based on a Research, Development, and Demonstration permit (issued through Resource Conservation and Recovery Act, Subtitle D, Part 258) within the last 10 years for an annual liquids addition report.

7. Annually, the permittee must submit a liquids addition report, to the AQD, within 365 days after the date the previous report was submitted with the following information:
- Volume of leachate recirculated (gallons per year) and the reported basis of those estimates (records or engineering estimates). **(40 CFR 62.16724(l)(1))**
  - Total volume of all other liquids added (gallons per year) and the reported basis of those estimates (records or engineering estimates). **(40 CFR 62.16724(l)(2))**
  - Surface area (acres) over which the leachate is recirculated (or otherwise applied). **(40 CFR 62.16724(l)(3))**
  - Surface area (acres) over which any other liquids are applied. **(40 CFR 62.16724(l)(4))**
  - The total waste disposed (megagrams) in the areas with recirculated leachate and/or added liquids based on on-site records to the extent data are available, or engineering estimates and the reported basis of those estimates. **(40 CFR 62.16724(l)(5))**
  - The annual waste acceptance rates (megagrams per year) in the areas with recirculated leachate and/or added liquids, based on on-site records to the extent data are available, or engineering estimates. **(40 CFR 62.16724(l)(6))**
  - The initial report must contain items (a) through (f) for the initial annual reporting period as well as for each of the previous 10 years, to the extent historical data are available in on-site records, and the report must be submitted no later than June 21, 2022. Subsequent annual reports must contain items (a) through (f) and be submitted no later than 365 days after the date the previous report was submitted and contain data for the most recent 365 days. **(40 CFR 62.16724(l)(7))**

See Appendix 8

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

#### **IX. OTHER REQUIREMENT(S)**

- If the NMOC emission rate is calculated to be equal to or greater than 34 Mg per year, the permittee must install a collection and control system in compliance with 40 CFR 62.16714(b) and (c) or conduct a surface emission monitoring demonstration using the Tier 4 procedures specified in Appendix 5 if Tier 1 or 2 testing demonstrates NMOC emissions less than 50 Mg per year. If the permittee chooses or is required to install a gas collection and control system, they must submit a gas collection and control system design plan within one year as specified in 40 CFR 62.16724(d) and install and operate a gas collection and control system within 30 months according to 40 CFR 62.16714(b) and (c). Additionally, within 90 days of determining NMOC emissions are above 34 Mg per year, the permittee shall apply for a revision of this permit to reflect applicable requirements of 40 CFR Part 62, Subpart OOO. **(R 336.1216(2), 40 CFR 62.16718(a)(4)(i)(A) and (B))**
- The permittee is exempted from the requirements to submit an NMOC emission rate report, after installing a collection and control system that complies with 40 CFR 62.16714(b) and (c), during such time as the collection and control system is in operation and in compliance with 40 CFR 62.16716 and 40 CFR 62.16720. **(40 CFR 62.16724(c)(4))**
- The permittee shall comply with all applicable provisions of the Federal Plan Requirements for Municipal Solid Waste Landfills as specified in 40 CFR Part 62, Subparts A and OOO. **(40 CFR Part 62, Subparts A and OOO)**

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**OPTIONAL:** Use the following condition only if a major source of HAPs as defined in 40 CFR 63.2.

4. The permittee must comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as specified in 40 CFR Part 63, Subparts A and AAAA. **(40 CFR Part 63, Subparts A and AAAA)**

Remove these footnotes if no PTIs are associated with this flexible group.

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



## **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii)."

If the facility requests an entry into this section, refer to the ROP Manual 4.B.2, "ROP Shell Instructions."

## APPENDICES

## Appendix 1. Acronyms and Abbreviations

| Common Acronyms           |  | Pollutant / Measurement Abbreviations |   |
|---------------------------|--|---------------------------------------|---|
| AQD                       | Air Quality Division   | acfm                                  | Actual cubic feet per minute  |
| BACT                      | Best Available Control Technology                              | BTU                                   | British Thermal Unit  |
| CAA                       | Clean Air Act  | °C                                    | Degrees Celsius   |
| CAM                       | Compliance Assurance Monitoring                                | CO                                    | Carbon Monoxide   |
| CEM                       | Continuous Emission Monitoring                                 | CO <sub>2</sub> e                     | Carbon Dioxide Equivalent   |
| CEMS                      | Continuous Emission Monitoring System                          | dscf                                  | Dry standard cubic foot   |
| CFR                       | Code of Federal Regulations                                    | dscm                                  | Dry standard cubic meter  |
| COM                       | Continuous Opacity Monitoring                                  | °F                                    | Degrees Fahrenheit  |
| Department/<br>department | Michigan Department of Environment,<br>Great Lakes, and Energy | gr                                    | Grains  |
| EGLE                      | Michigan Department of Environment,<br>Great Lakes, and Energy | HAP                                   | Hazardous Air Pollutant   |
| EU                        | Emission Unit  | Hg                                    | Mercury   |
| FG                        | Flexible Group   | hr                                    | Hour  |
| GACS                      | Gallons of Applied Coating Solids                              | HP                                    | Horsepower  |
| GC                        | General Condition  | H <sub>2</sub> S                      | Hydrogen Sulfide  |
| GHGs                      | Greenhouse Gases   | kW                                    | Kilowatt  |
| HVLP                      | High Volume Low Pressure*                                      | lb                                    | Pound   |
| ID                        | Identification   | m                                     | Meter   |
| IRSL                      | Initial Risk Screening Level                                   | mg                                    | Milligram   |
| ITSL                      | Initial Threshold Screening Level                              | mm                                    | Millimeter  |
| LAER                      | Lowest Achievable Emission Rate                                | MM                                    | Million   |
| MACT                      | Maximum Achievable Control Technology                          | MW                                    | Megawatts   |
| MAERS                     | Michigan Air Emissions Reporting System                        | NMOC                                  | Non-methane Organic Compounds                                       |
| MAP                       | Malfunction Abatement Plan                                     | NO <sub>x</sub>                       | Oxides of Nitrogen  |
| MSDS                      | Material Safety Data Sheet                                     | ng                                    | Nanogram  |
| NA                        | Not Applicable   | PM                                    | Particulate Matter  |
| NAAQS                     | National Ambient Air Quality Standards                         | PM10                                  | Particulate Matter equal to or less than 10<br>microns in diameter  |
| NESHAP                    | National Emission Standard for Hazardous<br>Air Pollutants     | PM2.5                                 | Particulate Matter equal to or less than 2.5<br>microns in diameter |
| NSPS                      | New Source Performance Standards                               | pph                                   | Pounds per hour   |
| NSR                       | New Source Review  | ppm                                   | Parts per million   |
| PS                        | Performance Specification                                      | ppmv                                  | Parts per million by volume   |
| PSD                       | Prevention of Significant Deterioration                        | ppmw                                  | Parts per million by weight   |
| PTE                       | Permanent Total Enclosure                                      | %                                     | Percent   |
| PTI                       | Permit to Install  | psia                                  | Pounds per square inch absolute                                     |
| RACT                      | Reasonable Available Control Technology                        | psig                                  | Pounds per square inch gauge  |
| ROP                       | Renewable Operating Permit                                     | scf                                   | Standard cubic feet   |
| SC                        | Special Condition  | sec                                   | Seconds   |
| SCR                       | Selective Catalytic Reduction                                  | SO <sub>2</sub>                       | Sulfur Dioxide  |
| SDS                       | Safety Data Sheet  | TAC                                   | Toxic Air Contaminant   |
| SNCR                      | Selective Non-Catalytic Reduction                              | Temp                                  | Temperature   |
| SRN                       | State Registration Number                                      | THC                                   | Total Hydrocarbons  |
| TEQ                       | Toxicity Equivalence Quotient                                  | tpy                                   | Tons per year   |
| USEPA/EPA                 | United States Environmental Protection<br>Agency               | µg                                    | Microgram   |
| VE                        | Visible Emissions  | µm                                    | Micrometer or Micron  |
|                           |  | VOC                                   | Volatile Organic Compounds  |
|                           |  | yr                                    | Year  |

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

## Appendix 2. Schedule of Compliance

### {CHOOSE ONE}

The permittee certified in this ROP application that this stationary source is in compliance with all applicable requirements of this ROP except for the following: {Enter condition number(s)}. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of the ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit the required certified progress reports accordingly.

### Compliance Plan

The permittee outlined the details of achieving compliance in a narrative Compliance Plan. The details of the Compliance Plan are outlined below.

[Insert the narrative details from the Compliance Plan that was submitted](#)

### Schedule of Compliance

The following schedule of compliance conforms with the provisions of Rule 119(a) and Rule 213(4).

| Emission Unit/<br>Flexible Group ID<br>and Condition No. | Applicable<br>Requirement | Remedial Measure | Required Action | Milestone<br>Date | Progress<br>Reports |
|--|---------------------------|------------------|-----------------|-------------------|---------------------|
|  |                           |                  |                 |                   |                     |
|  |                           |                  |                 |                   |                     |
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|  |                           |                  |                 |                   |                     |

### Progress Reports

The permittee shall submit Certified Progress Reports using the MiEnviro form ROP General Compliance Report. **(R 336.1213(4)(b))**

Progress reports shall contain the following information:

The projected dates for achieving scheduled activities, milestones or compliance as required in the schedule of compliance. **(R 336.1213(4)(b)(i))**

The actual dates that the activities, milestones, or compliance are achieved. **(R 336.1213(4)(b)(i))**

An explanation of why any dates in the Schedule of Compliance were not or will not be met. **(R 336.1213(4)(b)(ii))**

A description of any preventative or corrective measures adopted in order to ensure that the schedule of compliance is met. **(R 336.1213(4)(b)(ii))**

{OR}

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

### Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

### Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

### Appendix 5. Testing Procedures

The permittee must use the following approved procedures, to measure the pollutant emissions for the applicable requirements referenced in FGLANDFILL-OOO<34. (40 CFR 62.16718(a))

#### Tier 2

The permittee must determine the site-specific NMOC concentration using the following sampling procedure. The permittee must install at least two sample probes per hectare, evenly distributed over the landfill surface that has retained waste for at least 2 years. If the landfill is larger than 25 hectares in area, only 50 samples are required. The sample probes should be evenly distributed across the sample area. The sample probes should be located to avoid known areas of nondegradable solid waste.

The permittee must collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using 40 CFR Part 60, Appendix A-7, Methods 25 or 25C. Taking composite samples from different probes into a single cylinder is allowed; however, equal sample volumes must be taken from each probe. For each composite, the sampling rate, collection times, beginning and ending cylinder vacuums, or alternative volume measurements must be recorded to verify that composite volumes are equal. Composite sample volumes should not be less than one liter unless evidence can be provided to substantiate the accuracy of smaller volumes. Terminate compositing before the cylinder approaches ambient pressure where measurement accuracy diminishes. If more than the required number of samples is taken, all samples must be used in the analysis. The permittee must divide the NMOC concentration from 40 CFR Part 60, Appendix A-7, Method 25 or 25C by six (6) to convert from  $C_{NMOC}$  as carbon to  $C_{NMOC}$  as hexane. If the landfill has an active or passive gas removal system in place, Method 25 or 25C samples may be collected from these systems instead of surface probes provided the removal system can be shown to provide sampling as representative as the two-sampling probes per hectare requirement. For active collection systems, samples may be collected from the common header pipe. The sample location on the common header pipe must be before any gas moving, condensate removal, or treatment system equipment. For active collection systems, a minimum of three (3) samples must be collected from the header pipe. (40 CFR 62.16718(a)(3))

#### Tier 3

The site-specific methane generation rate constant must be determined using the procedures provided in 40 CFR Part 60, Appendix A-1, Method 2E. The permittee must estimate the NMOC mass emission rate using **Equation 1** (40 CFR 62.16718(a)(1)(i)) or **Equation 2** (40 CFR 62.16718(a)(1)(ii)) and using a site-specific methane generation rate constant (k), and the site-specific NMOC concentration as determined in 40 CFR 62.16718(a)(3) instead of the default values provided in 40 CFR 62.16718(a)(1). The permittee must compare the resulting NMOC mass emission rate to the standard of 34 Mg per year. (40 CFR 62.16718(a)(4))

**Tier 4**

The permittee must demonstrate that surface methane emissions are below 500 ppm. Surface emission monitoring must be conducted on a quarterly basis using the following procedures. Tier 4 is allowed only if the permittee can demonstrate that NMOC emissions are greater than or equal to 34 Mg/yr but less than 50 Mg/yr using Tier 1 or Tier 2. If both Tier 1 and Tier 2 indicate NMOC emissions are 50 Mg/yr or greater, then Tier 4 cannot be used.

The permittee must measure surface concentrations of methane along the entire perimeter of the landfill and along a pattern that traverses the landfill at no more than 30-meter intervals using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR 62.16720(d). The background concentration must be determined by moving the probe inlet upwind and downwind at least 30 meters from the waste mass boundary of the landfill.

Surface emission monitoring (SEM) must be performed in accordance with 40 CFR Part 60, Appendix A-7, Section 8.3.1 of Method 21 except that the probe inlet must be placed no more than 5 centimeters above the landfill surface; the constant measurement of distance above the surface should be based on a mechanical device such as with a wheel on a pole. The permittee must use a wind barrier, similar to a funnel, when onsite average wind speed exceeds 4 miles per hour or 2 meters per second or gust exceeding 10 miles per hour. Average on-site wind speed must also be determined in an open area at 5-minute intervals using an on-site anemometer with a continuous recorder and data logger for the entire duration of the monitoring event. The wind barrier must surround the SEM monitor, and must be placed on the ground, to ensure wind turbulence is blocked. SEM cannot be conducted if average wind speed exceeds 25 miles per hour.

Landfill surface areas where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover, and all cover penetrations must also be monitored using a device meeting the specifications provided in 40 CFR 62.16720(d).

Each permittee seeking to comply with the Tier 4 provisions must maintain records of surface emission monitoring as provided in 40 CFR 62.16726(g) and submit a Tier 4 surface emissions report as provided in 40 CFR 62.16724(d)(4)(iii).

If a landfill has installed and operates a collection and control system that is not required by this subpart, then the collection and control system must meet the following criteria: **(40 CFR 62.16718(a)(6)(viii))**

- (A) The gas collection and control system must have operated for at least 6,570 out of 8,760 hours preceding the Tier 4 surface emissions monitoring demonstration.
- (B) During the Tier 4 surface emissions monitoring demonstration, the gas collection and control system must operate as it normally would to collect and control as much landfill gas as possible.

**Appendix 6. Permit to Install****{CHOOSE ONE}****{For Initial ROP Issuance}**

The following table lists any Permit to Install and/or Operate, that relates to the identified emission units or flexible groups as of the effective date of this ROP. This includes all Permits to Install and/or Operate that are hereby incorporated into Source-Wide PTI No. SWPTI##### v#.#. PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

| Permit to Install Number | Description of Equipment | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|--------------------------|---|
|                          |                          |   |
|                          |                          |   |

**WORKING DRAFT**

ROP No: MI-ROP-

Expiration Date:

PTI No: MI-PTI-

| Permit to Install Number | Description of Equipment | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|--------------------------|---|
|                          |                          |   |
|                          |                          |   |
|                          |                          |   |
|                          |                          |   |
|                          |                          |   |
|                          |                          |   |

**{OR}****{For ROP Renewals}**

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-{SRN}-{YEAR}. {Note: this should be the most recently issued ROP, not a revision. If any revisions have been done since ROP issuance, do not include the "a, b, c" sequential number here.} Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-{SRN}-{YEAR} {Note: this should be the most recent version of the Source-Wide PTI. Include the latest sequential letter after the number if there was a revision.} is being reissued as Source-Wide PTI No. SWPTI##### v#.#.

{For a PTI that does not have an associated ROP revision application or an ROP revision application that does not have an associated PTI, enter NA in the appropriate column in the table below.}

| Permit to Install Number | ROP Revision Application Number | Description of Equipment or Change | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|---------------------------------|------------------------------------|---|
|                          |                                 |                                    |   |
|                          |                                 |                                    |   |
|                          |                                 |                                    |   |
|                          |                                 |                                    |   |
|                          |                                 |                                    |   |
|                          |                                 |                                    |   |

**Appendix 7. Emission Calculations**

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGLANDFILL-OOO<34.

**Default Values**

The permittee must calculate the NMOC emission rate using either **Equation 1** (the equation provided in 40 CFR 62.16718(a)(1)(i)) or **Equation 2** (the equation provided in 40 CFR 62.16718(a)(1)(ii)(A)). Both equations may be used if the actual year-to-year solid waste acceptance rate is known, as specified in **Equation 1** (40 CFR 62.16718(a)(1)(i)(A)), for part of the life of the landfill and the actual year-to-year solid waste acceptance rate is unknown, as specified in **Equation 2** (the equation provided in 40 CFR 62.16718(a)(1)(ii)(A)), for part of the life of the landfill. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for  $L_o$ , and 4,000 ppm by volume as hexane for the  $C_{NMOC}$ . For landfills located in geographical areas with a thirty-year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year. **(40 CFR 62.16718(a)(1))**

**Equation 1**

The following equation must be used if the actual year-to-year solid waste acceptance rate is known. **(40 CFR 62.16718(a)(1)(i)(A))**

$$M_{NMOC} = \sum_{i=1}^n 2 k L_o M_i (e^{-kt_i}) (C_{NMOC}) (3.6 \times 10^{-9})$$

Where:

$M_{NMOC}$  = Total NMOC emission rate from the landfill, megagrams per year

$k$  = methane generation rate constant, year<sup>-1</sup>

$L_o$  = methane generation potential, cubic meters per megagram solid waste

$M_i$  = mass of solid waste in the  $i^{\text{th}}$  section, megagrams

$t_i$  = age of the  $i^{\text{th}}$  section, years

$C_{NMOC}$  = concentration of NMOC, parts per million by volume as hexane

$3.6 \times 10^{-9}$  = conversion factor

The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for  $M_i$  if documentation of the nature and amount of such wastes is maintained.

### **Equation 2**

The following equation shall be used if the actual year-to-year solid waste acceptance rate is unknown. **(40 CFR 62.16718(a)(1)(ii)(A))**

$$M_{NMOC} = 2L_o R (e^{-kc} - e^{-kt}) (C_{NMOC}) (3.6 \times 10^{-9})$$

Where:

$M_{NMOC}$  = mass emission rate of NMOC, megagrams per year

$L_o$  = methane generation potential, cubic meters per megagram solid waste

$R$  = average annual acceptance rate, megagrams per year

$k$  = methane generation rate constant, year<sup>-1</sup>

$t$  = age of landfill, years

$C_{NMOC}$  = concentration of NMOC, parts per million by volume as hexane

$c$  = time since closure, years; for active landfill  $c = 0$  and  $e^{-kc} = 1$

$3.6 \times 10^{-9}$  = conversion factor

The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value of  $R$ , if documentation of the nature and amount of such wastes is maintained.

### **Tier 1**

The permittee must calculate NMOC mass emission rate utilizing Equation 1 or 2 in **Appendix 7**, as applicable, and compare it to the standard of 34 Mg per year. **(40 CFR 62.16718(a)(2))**

**Tier 2**

The permittee must recalculate the NMOC mass emission rate using **Equation 1** or **Equation 2** in **Appendix 7** and using the average site-specific NMOC concentration from the collected samples (**Tier 2** testing in **Appendix 5**) instead of the default value in the equation provided in 40 CFR 62.16718(a)(1). **(40 CFR 62.16718(a)(3)(ii))**

If the resulting **Tier 2** NMOC mass emission rate is less than 34 Mg per year, the permittee must submit a periodic estimate of NMOC emissions in an NMOC emission rate report as provided in 40 CFR 62.16724(c) and must recalculate the NMOC mass emission rate annually as required under 40 CFR 62.16714(e). The site-specific NMOC concentration must be retested every 5 years. **(40 CFR 62.16718(a)(3)(iii))**

If the NMOC mass emission rate as calculated using the Tier 2 site-specific NMOC concentration is equal to or greater than 34 Mg per year, then the permittee must either:

1. Comply with 40 CFR 62.16724(d) (submit a gas collection and control system design plan prepared by a professional engineer within 1 year) **(40 CFR 62.16718(a)(3)(iv)(A))**, or
2. Determine the site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate using the procedure specified in **Tier 3** (40 CFR 62.16718(a)(4)), **(40 CFR 62.16718(a)(3)(iv)(B))**, or
3. Conduct a surface emission monitoring demonstration using the Tier 4 procedures specified in 40 CFR 62.16718(a)(6). **(40 CFR 62.16718(a)(3)(iv)(C))**

**Tier 3**

If the NMOC mass emission rate as calculated using the Tier 2 site-specific NMOC concentration and Tier 3 site-specific methane generation rate is equal to or greater than 34 Mg per year, the permittee must either comply with 40 CFR 62.16724(d) (submit a collection and control system design plan prepared by a professional engineer within 1 year) or conduct a surface emission monitoring demonstration using the Tier 4 procedures specified in Appendix 5 and 40 CFR 62.16718(a)(6). **(40 CFR 62.16718(a)(4)(i)(A))**

If the NMOC mass emission rate is less than 34 Mg per year, then the permittee must recalculate the NMOC mass emission rate annually, as provided in 40 CFR 62.16718(a)(1) using **Equation 1** or **Equation 2**, and using the site-specific Tier 2 NMOC concentration and Tier 3 methane generation rate constant and submit a periodic NMOC emission rate report as provided in 40 CFR 62.16724(c). The calculation of the methane generation rate constant (**Tier 3**) is performed only once, and the value obtained from this test must be used in all subsequent annual NMOC emission rate calculations. **(40 CFR 62.16718(a)(4)(ii))**

**Calculating expected gas generation flow rates from the landfill**

For the purposes of calculating the maximum expected gas generation flow rate from the landfill to determine compliance with 40 CFR 62.16714(b)(2)(i), either **Equation 5** or **Equation 6**, below, must be used. The methane generation rate constant (k) and methane generation potential (L<sub>0</sub>) kinetic factors should be those published in the most recent AP-42 or other site-specific values demonstrated to be appropriate and approved by the USEPA Administrator. If k has been determined as specified in 40 CFR 62.16718(a)(4), the value of k determined from the test must be used. A value of no more than 15 years must be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure. **(40 CFR 62.16720(a)(1))**

If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, **Equation 5** or **Equation 6, below**. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using **Equation 5** or **Equation 6, below**, or other methods must be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment. **(40 CFR 62.16720(a)(1)(iii))**

**Equation 5**



$$Q_m = 2L_o R (e^{-kc} - e^{-kt})$$

Where:

$Q_m$  = Maximum expected gas generation flow rate, cubic meters per year.

$L_o$  = Methane generation potential, cubic meters per megagram solid waste.

$R$  = Average annual acceptance rate, megagrams per year.

$k$  = Methane generation rate constant, year<sup>-1</sup>.

$t$  = Age of the landfill at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less. If the equipment is installed after closure,  $t$  is the age of the landfill at installation, years.

$c$  = Time since closure, years (for an active landfill  $c = 0$  and  $e^{-kc} = 1$ ).

#### **Equation 6**

$$Q_m = \sum_{i=1}^n 2 k L_o M_i (e^{-kt_i})$$

Where:

$Q_m$  = Maximum expected gas generation flow rate, cubic meters per year.

$k$  = Methane generation rate constant, year<sup>-1</sup>.

$L_o$  = Methane generation potential, cubic meters per megagram solid waste.

$M_i$  = Mass of solid waste in the  $i^{\text{th}}$  section, megagrams.

$t_i$  = Age of the  $i^{\text{th}}$  section, years.

## **Appendix 8. Reporting**

### **A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use the MiEnviro forms ROP Annual Compliance Certification and ROP Semi-Annual Compliance Certification for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions.

### **B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.