

Implementation of XXX and EG OOO

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July 12, 2022



Outline

- Background
- Key Elements
- Example
- Title V Closure

NSPS XXX and EG OOO Background

- August 2016
 - Emission Guidelines (EG) under NSPS Subpart Cf
 - NSPS Subpart XXX
- Federal Implementation Plan (FIP): Mandated compliance with EG
 - FIP published May 21, 2021; Implemented: June 21, 2021
- **Replacing Subpart WWW and Subpart Cc**
 - **Mandates GCCS control requirements**

NSPS XXX and EG OOO

- Applies to existing MSW landfills
 - Federal lands; OR
 - OOO: States without an approved State Implementation Plan (SIP)
- Modification: increase in permitted volume design capacity by horizontal or vertical expansion
 - Occurs when landfill commences construction in that expansion area

What Rule Applies to My Landfill?

- NSPS Subpart XXX (40 CFR Part 60)
 - July 17, 2014 - Commenced construction, reconstruction or modification **after**
- EG Subpart OOO (40 CFR Part 62)
 - November 8, 1987 - Has accepted waste since or has additional capacity for future waste; AND
 - July 17, 2014 - Commenced construction, reconstruction or modification **on or before**

Key Elements of XXX and OOO

- Reduced NMOC Threshold for GCCS
 - 50 Mg/yr to 34 Mg/yr
- Changes to Wellhead Operating Conditions
 - Oxygen requirement - Removed (must still monitor monthly)
- Liquids Addition Reporting
 - Initial Report: recirculated leachate/disposed liquid wastes at all within past 10 years
 - Annual report

Key Elements of XXX and OOO

- Additional Wellhead Corrective Actions
 - Root Cause/Corrective Action Analysis (RCA/CAA) Requirements
 - Positive pressure or temperature above 131° F
 - > 15 days – Conduct RCA
 - > 60 days – Create CAA with implementation schedule
 - > 120 days – Submit RCA and CAA to EPA

Key Elements of XXX and OOO

- Changes to SEM Requirements
 - Penetration Monitoring
 - GPS Coordinates of Exceedances
- Tier 4 - SEM Demonstration
 - 4 consecutive quarters below 500 ppmv **does not** trigger GCCS
 - Annual testing following quarterly testing success
 - **One reading above 500 ppmv requires GCCS install**
 - Can't use other Tier methods if Tier 4 fails

Key Elements of XXX and OOO

- Shutdown, Startup, Malfunction (SSM) Plan Requirement – Eliminated
 - Comply with work practice standard
- All Control Device and GCCS Downtime Reported
 - No 1-hour or 5-day limitations
- Annual Report is required if subject to GCCS control

EG Subpart 000 Specific

	Designated Facility With Design Capacity of: (million Mg OR million cubic meters)		Legacy Controlled Landfill	Closed Landfill Subcategory
	< 2.5	> 2.5		
Definition	Existing landfill and was not subject to GCCS before June 21, 2021	Existing landfill and was not subject to GCCS before June 21, 2021	Existing landfill and <u>was</u> subject to GCCS under Subpart WWW or Subpart Cc	Closed on or before September 27, 2017 AND Closure Report submitted before July 17, 2014
Report Requirements	Initial Design Capacity Report due by Sept. 21, 2021	Initial Design Capacity Report and NMOC Rate Report due by Sept. 21, 2021	No Initial Design Capacity Report and NMOC Rate	No Initial Design Capacity Report and NMOC Rate
NMOC Threshold	Not Applicable	34 (Mg/yr)	34 (Mg/yr)	50 (Mg/yr) for Equipment Removal Report *

*If site was subject to GCCS

General Reminders

- New NSPS/EG GCCS controlled facilities
 - Continue 30-month timeline, clock does not restart when triggering OOO
- Existing GCCS controlled facilities
 - EPA has made it clear that a site cannot re-evaluate NMOC emissions to model it below 34 Mg/year threshold under NSPS or EG rule

Things to Consider

- Consider close-out reports for old NSPS/EG rules
- Update Title V permit to reflect applicable NSPS or EG and NESHAP rules
 - Requirements and deadlines have likely changed
- Initial Subpart OOO Reports – **Due Sept. 21, 2021**
 - Design capacity & NMOC report
 - Closed facilities

Example

- MSW landfill in Kansas (No approved EG SIP)
- NSPS WWW Compliant GCCS
 - June 21, 2021: Now subject to OOO from WWW
 - Submitted final WWW Semi-Annual Report
 - Updated Title V to reflect OOO requirements
- 2020: Approved for vertical expansion but have not gone into airspace
 - Will be subject to XXX when commence construction
 - Will submit final OOO Semi-Annual Report
 - Update Title V to reflect XXX requirements

Can I get out of XXX or OOO?

- GCCS Equipment Removal Requirements
 - Landfill is closed,
 - GCCS in operation for at least 15 years; AND
 - Three (3) successive NMOC tests below 34 Mg/yr
 - Unless Closed Landfill Subcategory – 50 Mg/yr
- Close out Title V (Operating Permit)

How to Terminate Title V

- Operating Permit
 - Landfill is closed AND
 - Not subject to GCCS OR approved GCCS Equipment Removal Report
- Subject to any applicable Construction Permits

Takeaways from XXX and OOO

- Lower NMOC Threshold for GCCS (34 Mg/yr)
- No oxygen standard
- Liquid additions
- Root Cause Analysis
- Tier 4 SEM option
- No SSM
 - All control devices and GCCS downtime must be recorded and reported

Questions?



If you have any questions, contact me at mengel@scsengineers.com or 913-749-0715