From: Holtom, Jonathan
To: "McNeal, Dave"
Subject: RE: Help with 40 CFR 60, WWW
Date: Wednesday, May 28, 2014 3:25:00 PM

Thank you Dave, this helps confirm my direction.

I managed to find some of the same letters (including one I just found about an hour ago buried in our files specific to the facility whose permit I am currently renewing), but these all appeared to be more of a case-by-case review. I was hoping there might be a rule that the approved "consensus" conditions were based upon, but it looks like they are more of a guidance type standard rather than rule based conditions.

I appreciate your response and know better how to proceed with this permit renewal clean-up. Thank you again for your time!

Jon Holtom, P.E., CPM
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Division of Air Resource Management
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From: McNeal, Dave [mailto:Mcneal.Dave@epa.gov]
Sent: Wednesday, May 28, 2014 3:16 PM
To: Holtom, Jonathan
Cc: Rinck, Todd
Subject: RE: Help with 40 CFR 60, WWW

Jonathan,

There are several letters on the Applicability Determination Index (http://cfpub.epa.gov/adi/) that define "treatment" for landfill gas, but the consensus I see when looking over these determinations is that treating the gas by filtering it to 10 microns or less, dewatering it, and compressing it is sufficient for the gas stream to be exempt from additional control requirements under Subpart WWW.

David McNeal
EPA Region 4
404-562-9102

From: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]
Sent: Tuesday, May 27, 2014 2:29 PM
To: McNeal, Dave
Subject: Help with 40 CFR 60, WWW

Hello Dave,

I'm told that you may be the resident expert on 40 CFR 60, Subpart WWW. I am trying to clean up a Title V renewal permit for a landfill and am hoping you can point me in the right direction. Once landfill gas is collected, 60.752(b)(2)(iii) provides three options for controlling the gas. (A) and (B) are pretty straightforward, but I'm unclear on (C). Are there any standards specified, either in this rule or another, that state to what level the gas must be treated for subsequent sale or use? In this case, the landfill has spark ignition RICE for generating electricity, and I am trying to determine what requirements must be imposed on the treatment system for the quality of the cleaned gas in order for the gas to be used as fuel and reciprocating engines not be subject to the requirements of (B) for 98% reduction of NMOC?

From 40 CFR 60.752(b)(2)(iii):

(iii) Route all the collected gas to a control system that complies with the requirements in either paragraph (b)(2)(iii) (A), (B) or (C) of this section.

(A) An open flare designed and operated in accordance with §60.18 except as noted in §60.754(e);

(B) A control system designed and operated to reduce NMOC by 98 weight-percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen. The reduction efficiency or parts per million by volume shall be established by an initial performance test to be completed no later than 180 days after the initial startup of the approved control system using the test methods specified in §60.754(d).

(*1*) If a boiler or process heater is used as the control device, the landfill gas stream shall be introduced into the flame zone.

(*2*) The control device shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in §60.756;

(C) Route the collected gas to a treatment system that processes the collected gas for subsequent sale or use. All emissions from any atmospheric vent from the gas treatment system shall be subject to the requirements of paragraph (b)(2)(iii) (A) or (B) of this section.

Thanks for you help!

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