APPENDIX F–ALTERNATE STANDARDS FOR LOW GAS PRODUCTION EXTRACTION WELLS AND LEACHATE CLEANOUT RISER CONNECTIONS [1]

Purpose: This is to allow for alternate standards for oxygen and pressure pertaining to extraction wells and leachate risers where gas flows are very low that even applying minimal vacuum results in exceedances of 5% oxygen concentration limit as required by 40 CFR 60.753(c). This alternate standards and procedures outlined below is intended to have greater non-methane organic compound (NMOC) emissions control by managing the gas system as opposed to well decommissioning (physically disconnected from the collection and control system).

1. For low gas production wells and leachate risers that have an oxygen concentration limit exceedance, the owner or operator may shut down the wells/leachate risers to allow landfill gas to build up. This may cause positive pressure in the wellheads/leachate risers. The elevated oxygen concentrations and positive pressure will not be considered as exceedances of the operating limits in 40 CFR 60.753 provided that the owner or operator is complying with the surface methane concentration limit of 500 ppm around the vicinity of the wells/leachate risers.

2. The owner or operator shall conduct monthly oxygen, pressure and surface methane monitoring and the results shall be reported to the Department on a semiannual basis and can be included as part of semiannual report required by 40 CFR 63.1980 (f). The owner or operator shall report the gas flow for the wells and risers.

3. If the monthly monitoring indicates that the gas production has improved and the oxygen concentration has dropped below 5%, the extraction location shall be brought back on line until the gas quality decline again. If the oxygen level can be maintained below the regulatory limit of 5 %, this alternate standard is terminated and the wells/leachate risers shall be operated in accordance with the requirements of 40 CFR 60, Subpart WWW.

4. If monthly monitoring indicates that the pressure has built up in the extraction point and exceedance of 500 ppm surface methane concentration is detected in the vicinity, the owner or operator shall make adjustment to vacuum immediately to remove accumulated landfill gas and follows the procedures as described by 40 CFR 60.755 (c)(4) for corrective actions.

5. Below are the gas extraction wells that have low gas production and are approved by the Department to use the alternate standards as described in this appendix. To add or remove wells/leachate risers from the list, the owner or operator shall notify and furnish supporting information in order to obtain approval from the Department. The supporting information shall at least include 2 years of monitoring results for the wells/leachate risers. These alternate standards are not applicable until the owner or operator received formal approval from the Department. A Title V permit revision is not required for this approval process.

Approved Gas Extraction Wells/Leachate Risers

Gas Extraction Well ID Number
N/A

Leachate Riser Connection ID Number
N/A

[1] This Alternate Standards approach is based on EPA Region 5 Determination dated 4/4/08.