



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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April 6, 2004

Mr. Barry Ledbetter, P.E.
Environmental Engineer
Liberty Landfill, Inc.
8635 E. State Road 16,
Monticello, Indiana 47960

Re:Response to Review Request No.181-18574
Part 70 Permit No.: 181-7338
Plant ID: 181-00035

Dear Mr. Ledbetter:

Liberty Landfill, Inc. located at 8635 E. State Road 16, Monticello, Indiana, submitted a review request on February 24, 2004. The letter was submitted to request an applicability determination on whether the processes that occur at the landfill gas recovery plant prior to the combustion of the gas in the internal combustion engine meet the requirements for a "treatment system" in New Source Performance Standards (NSPS) (40 CFR Part 60, Subpart WWW; 60.752(b)(2)(iii)(C)).

Source Background

The landfill gas from Liberty Landfill, Inc. is sent to an energy recovery plant where the gas is combusted in reciprocating internal combustion engines. Liberty Landfill's gas collection system and control system is subject to the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and the National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA). In this review request, Liberty Landfill, Inc. requests for clarification that once treated per 40 CFR 60.752(b)(2)(iii)(C) the landfill gas is no longer subject to the requirements under NSPS and NESHAP.

Also, the source has indicated that prior to use as fuel in the internal combustion engines and generators, the landfill gas is first 1) de-watered through a mesh pad scrubber, 2) compressed, 3) chilled with air-exchange cooler, 4) filtered down through a 5-micron filter, and 5) sent through a Gas/Gas heat exchanger to reheat the gas in order to prevent condensation of liquids in the piping or engine fuel system.

Determination

According to 40 CFR Part 60.752(b)(2)(iii), collected landfill gas is required to be routed to a control system that complies with the requirements in either: A) an open flare; B) a control system or enclosed combustor designed to reduce NMOC; or C) a treatment system that processes the collected gas for subsequent sale or use. The landfill gas generated by Liberty Landfill, Inc. has been treated for sale or use under 40 CFR 60.752(b)(2)(iii)(C). IDEM, OAQ, and US EPA has determined that compression, de-watering, and filtering the landfill gas down to at least 10 microns is considered treatment



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for the purposes of 40 CFR 60.752(b)(2)(iii)(C).

Liberty Landfill, Inc. also requests clarification that once the landfill gas is treated pursuant to 40 CFR 60.752(b)(2)(iii)(C), that the gas is no longer subject to the requirements found under the NSPS and NESHAP. IDEM, OAQ, and US EPA has determined that once the landfill gas is treated, the facilities that buy or use the gas have no further obligations related to the NSPS. Therefore, once the gas has been treated and sent to the internal combustion engines, the treated gas is no longer subject to the requirements of the NSPS and, in turn, the NESHAP.

However, emissions from any atmospheric vent from the gas treatment system, including any compressor, are subject to the requirements of 40 CFR 60.752(b)(2)(iii)(A) and (B), as well as the NESHAP. This does not include exhaust from an energy recovery device.

This determination was based on previous US EPA determinations.

Questions should be directed to Adeel Yousuf, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3252, or call 1-800-451-6027 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

AY/EVP

cc: File - White County
White County Health Department
Air Compliance Section Inspector - Wanda Stanfield
Compliance Data Section
Administrative and Development -Sara Cloe
Technical Support and Modeling - Michele Boner