



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

AIR & RADIATION  
DIVISION

November 10, 2020

Ms. Alexa Deep  
Staff Engineer  
SCS Engineers  
2405 140th Avenue NE, Suite 107  
Bellevue, Washington 98005

Re: Alternative Remedy and Timeline for Anchorage Regional Landfill under NSPS WWW

Dear Ms. Deep:

This letter is in response to your letter to the U.S. Environmental Protection Agency, Region 10 dated August 7, 2020, requesting an alternative remedy and corresponding timeline pursuant to 40 CFR 60.755(c)(4)(v) for the Anchorage Regional Landfill (“the Landfill”), a facility subject to 40 CFR part 60, subpart WWW: *Standards of Performance for Solid Waste Landfills* (NSPS WWW). The EPA is approving the alternative remedy and a corresponding timeline. Please note that the approved timeline is shorter than the extended timeline requested by the Landfill.

### **Background**

Under 40 CFR 60.753(d), owners and operators of landfills subject to NSPS WWW are required to operate a landfill gas collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. According to 40 CFR 60.755(c)(1), monitoring must be performed quarterly.

During surface emissions monitoring conducted between June 15-17, 2020, sixty-four locations at the Landfill were found to exceed the 500-ppm threshold. After remonitoring on June 24, July 1, and July 13, and 14, five locations at the Landfill were found to have exceeded the 500-ppm threshold three times.

According to 40 CFR 60.755(c)(4)(v):

For any location where monitored methane concentration equals or exceeds 500 parts per million above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Administrator for approval.

In your August 7, 2020 letter, you request an extended timeline for a blower upgrade project. Upgrading blowers is specifically identified as an alternative remedy in NSPS WWW. Because the first exceedance was discovered on June 15, 2020, the 120-day period that would apply for a new well ended on October 13, 2020.

After a request from the EPA for more information, a September 24, 2020 letter included an equipment delivery and installation timeline from Parnel Biogas, Inc. The letter identified October 30 as the expected project completion date.

You requested until December 31, 2020, to complete the work to account for possible delivery delays, unforeseen circumstances (e.g. delays related to COVID-19), and the completion of wellfield adjustments and surface emission monitoring. Such adjustments may be necessary because the new blowers have a nominal airflow of twice the old blowers (2000 cubic feet per minute (cfm) vs. 1000 cfm) and the old blowers may have degraded over time.

### **Regulatory Authority**

The authority to approve alternative remedies and corresponding timelines after monitored exceedances of surface level methane under 40 CFR 60.755(c)(4)(v) is not identified in NSPS WWW as an authority retained by the Administrator of the EPA. See 40 CFR 60.750(b).

However, because the Alaska Department of Environmental Conservation has not requested, and the EPA has not granted, delegation of NSPS WWW, the EPA is the authority to review this request.

### **Determination**

Upgrading blowers is specifically identified as an alternative remedy in NSPS WWW; therefore, the EPA can approve the alternative remedy and a corresponding timeline. Based on the information provided by the Landfill, the EPA approves the alternative remedy of a blower upgrade and agrees that extra time is warranted. The EPA is approving an extended timeline that allows 30 days beyond the expected installation date of October 30, 2020. Because this day is a Sunday, an additional day will be added. Thus, the timeline for installing the new blowers is extended until November 30, 2020 to allow for possible contingencies and for rebalancing of the system.

The EPA determined that a timeline extending to December 31, 2020, is excessive and is based on a misunderstanding of the applicable regulation. 40 CFR 60.755(c)(4)(v) requires a timeline for installation, not for conducting subsequent monitoring. If there are additional delays caused by the Covid-19 pandemic or other unforeseen events, you may apply to extend the timeline beyond November 30, 2020.

Approval of this alternate remedy and corresponding timeline in 40 CFR 60.755(c)(4)(v) does not waive or modify any other requirement that applies to the Landfill, including the requirement to perform required surface monitoring.

If you have any questions about this matter, please contact Mr. Geoffrey Glass of my staff at (206) 553-1847 or glass.geoffrey@epa.gov.

Sincerely,

**Johansen,  
Amy**

Digitally signed by  
Johansen, Amy  
Date: 2020.11.10  
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**Amy Johansen, Chief  
Air Permits and Toxics Branch**

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