



Eddie Durant -MDE- <eddie.durant@maryland.gov>

Frederick County Comments and Questions on MDE Methane Regulation Framework

Trivedi, Mehal <MTRIVEDI@frederickcountymd.gov>

Wed, Jul 21, 2021 at 1:20 PM

To: Eddie Durant -MDE- <eddie.durant@maryland.gov>

Eddie,

After reviewing the materials that MDE provided, it still remains unclear what MDE will include in a draft regulation and therefore what effect the regulations will have. But based on the materials provided at the meeting, MDE is looking at requiring active systems for landfills that have accepted waste since 11/8/1987 with at least 450,000 tons of waste-in-place (entire landfill), and a landfill gas "heat capacity" of 3.0 MMBTU/hr. This would equate to around 100cfm at 50% methane. As we understand, this would significantly reduce the threshold for requiring an active system below the 34 Mg/yr NMOC threshold.

Currently, Frederick County Landfill is well below that threshold and has voluntarily installed active gas systems. MDE proposal is to control methane from MSW landfill, that active gas collection be in place as soon as waste is placed in a cell. If it is required to be under vacuum (operating) that would be a major safety issue as it would pull in oxygen.

Under current Title V permit, we have approval for one (1) enclosed and two (2) candlestick/open-type flare, for operation. We are hoping that 'grandfathering in' of candlestick flares will be allowed, as these are already operating on approved site.

MDE would require surface emission monitoring on the entire surface of landfill areas containing waste, and do not have provisions for avoiding active areas. So this would add operational/monitoring requirements.

Adding gas extraction wells in shallow/beginning cells requires them to be extend as the cell rises, which adding on to these wells may reduce the capture efficiency and increase safety risks to the installers.

Additionally, the low wind requirements and waiting at least 3 days between rainfall events for SEM would be significant obstacles. In last 13 years of site specific rain gauge data, it has precipitated approximately 1200 days out of 5000 days. For reference, it rains about 2.8-3.8 days in MD.

Best regards,

Mehal M Trivedi, Engineer II, Department of Regulatory Compliance

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From: Eddie Durant -MDE- <eddie.durant@maryland.gov>

Sent: Tuesday, June 29, 2021 3:01 PM

To: Randy Mosier -MDE- <randy.mosier@maryland.gov>

Cc: George Aburn -MDE- <tad.aburn@maryland.gov>

Subject:

[EXTERNAL EMAIL]

Dear Stakeholders,

The purpose of this email is to inform you that presentation materials (includes the agenda, recording of the webinar, and both presentations) from the June 23, 2021 virtual webinar to discuss new requirements to control methane emissions from municipal solid waste (MSW) landfill has been uploaded to the Maryland Department of the Environment (MDE) website, which can be found at the following link below:

<https://mde.maryland.gov/programs/Regulations/air/Pages/ARMARegulationsStakeholders.aspx>

In addition, the Department politely requests that stakeholders who wish to submit written comments to please do so no later than July 20, 2021, so that they may be given consideration. Stakeholders are strongly encouraged to submit written comments via email - either to me or Randy Mosier (Chief, Regulation Development Division). If you have any questions or comments, please feel free to contact me.

Thank you once again for your interest and participation.

Sincerely,

Eddie

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Eddie DuRant
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