



**Maryland**  
Department of  
the Environment

Wes Moore, Governor  
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary  
Suzanne E. Dorsey, Deputy Secretary

Ms. Marilyn E. Naumann, C.P.M, Associate Director  
Prince George's County Department of the Environment  
Waste Management Division  
3500 Brown Station Road  
Upper Marlboro, MD 20774

APR 22 2024

Dear Ms. Naumann:

Re: Renewal Part 70/ Title V Operating Permit #24 033-02084 Brown Station Road Landfill

Enclosed, please find the Renewal Part 70/Title V Operating Permit and Fact Sheet for the Brown Station Road Landfill located in Upper Marlboro, MD. The Permit will expire on October 31, 2028.

The Code of Maryland Regulations (COMAR) 26.11.03.11 states the following:

If the Department denies a Part 70 permit or issues it with terms and conditions that are objectionable to the applicant, the applicant may request that a contested case hearing be held regarding the permit. This request shall be made to the Department in writing not later than 15 days after the applicant receives notice that the permit has been denied or of the objectionable terms and conditions. The request shall include the basis for the request and refer to any objectionable terms and conditions.

Please note the following revised condition in the Permit under Section II, General Conditions, Number 5, Permit Renewal:

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit 12 months before the expiration of the permit. Upon submitting a complete application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

If you have any questions, please feel free to contact Mr. Mario Cora, Chief, Chief, Combustion and Metallurgical Division, at [mario.cora@maryland.gov](mailto:mario.cora@maryland.gov), or (410) 537-3230.

Sincerely,

Suna Yi Sariscak, Manager  
Air Quality Permits Program  
Air & Radiation Administration

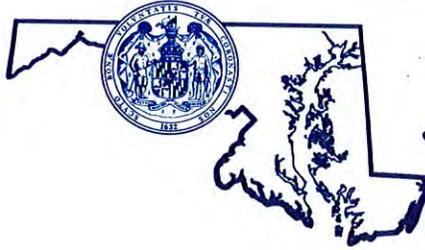
SYS/jm

Enclosures

cc: EPA Region III (w/encl)

Wes Moore  
Governor

*State of*



*Maryland*

Serena McIlwain  
Secretary

**DEPARTMENT OF THE ENVIRONMENT**

Air and Radiation Administration  
1800 Washington Boulevard, Suite 720  
Baltimore, MD 21230

Construction Permit

Part 70  
Operating Permit

PERMIT NO. 24-033-02084

DATE ISSUED APR 22 2024

PERMIT FEE To be paid in accordance  
with COMAR 26.11.02.19B

EXPIRATION  
DATE October 31, 2028

**LEGAL OWNER & ADDRESS**

Prince George's County Government  
Department of the Environment  
Waste Management Division  
3500 Brown Station Road  
Upper Marlboro, MD, 20774  
Attn: Ms. Marilyn E. Naumann, C.P.M.  
Associate Director

**SITE**

Brown Station Road Sanitary Landfill  
3500 Brown Station Road  
Upper Marlboro, MD 20774  
A.I. #643

**SOURCE DESCRIPTION**

Municipal Solid Waste Landfill.

This source is subject to the conditions described on the attached pages.

Page 1 of 128

Program Manager

Director, Air and Radiation Administration

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>SECTION I</b>	<b>SOURCE IDENTIFICATION .....</b>	<b>4</b>
1.	DESCRIPTION OF FACILITY .....	4
2.	FACILITY INVENTORY LIST .....	6
<b>SECTION II</b>	<b>GENERAL CONDITIONS .....</b>	<b>8</b>
1.	DEFINITIONS .....	8
2.	ACRONYMS .....	8
3.	EFFECTIVE DATE .....	9
4.	PERMIT EXPIRATION .....	9
5.	PERMIT RENEWAL .....	9
6.	CONFIDENTIAL INFORMATION .....	10
7.	PERMIT ACTIONS .....	10
8.	PERMIT AVAILABILITY .....	11
9.	REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA .....	11
10.	TRANSFER OF PERMIT .....	11
11.	REVISION OF PART 70 PERMITS – GENERAL CONDITIONS .....	11
12.	SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS .....	12
13.	MINOR PERMIT MODIFICATIONS .....	13
14.	ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS .....	16
15.	OFF-PERMIT CHANGES TO THIS SOURCE .....	18
16.	ON-PERMIT CHANGES TO SOURCES .....	19
17.	FEE PAYMENT .....	21
18.	REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS .....	21
19.	CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION .....	22
20.	PROPERTY RIGHTS .....	23
21.	SEVERABILITY .....	23
22.	INSPECTION AND ENTRY .....	23
23.	DUTY TO PROVIDE INFORMATION .....	24
24.	COMPLIANCE REQUIREMENTS .....	24
25.	CREDIBLE EVIDENCE .....	25
26.	NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE .....	25
27.	CIRCUMVENTION .....	25
28.	PERMIT SHIELD .....	25
29.	ALTERNATE OPERATING SCENARIOS .....	26
<b>SECTION III</b>	<b>PLANT WIDE CONDITIONS .....</b>	<b>27</b>
1.	PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION .....	27
2.	OPEN BURNING .....	27
3.	AIR POLLUTION EPISODE .....	27
4.	REPORT OF EXCESS EMISSIONS AND DEVIATIONS .....	27
5.	ACCIDENTAL RELEASE PROVISIONS .....	28
6.	GENERAL TESTING REQUIREMENTS .....	29
7.	EMISSIONS TEST METHODS .....	29
8.	EMISSIONS CERTIFICATION REPORT .....	29
9.	COMPLIANCE CERTIFICATION REPORT .....	31
10.	CERTIFICATION BY RESPONSIBLE OFFICIAL .....	31
11.	SAMPLING AND EMISSIONS TESTING RECORD KEEPING .....	32

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

12.	GENERAL RECORDKEEPING.....	32
13.	GENERAL CONFORMITY .....	33
14.	ASBESTOS PROVISIONS.....	33
15.	OZONE DEPLETING REGULATIONS.....	33
16.	ACID RAIN PERMIT .....	34
<b>SECTION IV</b>	<b>PLANT SPECIFIC CONDITIONS .....</b>	<b>35</b>
<b>SECTION V</b>	<b>INSIGNIFICANT ACTIVITIES .....</b>	<b>118</b>
<b>SECTION VI</b>	<b>STATE ONLY ENFORCEABLE CONDITIONS .....</b>	<b>122</b>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**SECTION I SOURCE IDENTIFICATION**

**1. DESCRIPTION OF FACILITY**

The Brown Station Road Sanitary Landfill (BSRSL) is a municipal solid waste landfill with a primary SIC code of 4953 and NAIC Code 562212. It is located about 2.5 miles northwest of the town of Upper Marlboro, Maryland on Brown Station Road. The landfill facility is owned by the Prince George's County Government, Department of Environmental Resources, Waste Management Division (the County). The landfill encompasses 850-acres and is divided into two primary areas: Area A and B. Area A is a closed landfill that has two separate disposal areas (A1 and A2). Area A is approximately 148 acres in size. Area B, containing eleven planned cells, has been operational since 1992 and it encompasses approximately 140 acres. Waste has been placed in nine cells.

Area A and Area B incorporate landfill gas (LFG) collection and control systems. The main header pipeline of the LFG collection system splits and directs LFG to a flare station and to three compressors located onsite in the Compressor Building. The flare station contains three (3) enclosed flares (F1, F2, and F3) with minimum designed LFG destruction efficiency of 98 percent. In the Compressor Building, LFG is compressed, dehydrated, and filtered. The treated LFG is routed on-site to a power plant (four LFG-powered electrical generators G1 thru G4) and two boilers in the garage (GB1 and GB2). Excess LFG is also routed off-site to feed three LFG-power electrical generators, six boilers, and three water heaters, all located at the Prince George's County Correctional Facility (two miles away).

Leachate from Area B is collected in two on-site leachate storage tanks (750,000 gallons each) and is pretreated at the on-site Leachate Pretreatment Plant (LPP). The leachate treatment system consists of pH control, a flocculation basin, primary clarifier, biological treatment, and sludge collection system. Wastewater effluent from the leachate pretreatment plant is discharged into WSSC sanitary sewer system. Volatiles that are emitted from various stages of the LPP are collected and directed to a fume scrubber (FS1) by blowers. Caustic soda and bleach solution are used as gas scrubbing agents. Two (2) boilers (B1 and B2) that run on No. 2 fuel oil are used to preheat the leachate influent and to heat the building space.

Under normal operation the plant treats the leachate using a sequencing batch reactor process. However, the plant also has dual up flow anaerobic sludge blanket (UASB) reactors that can treat the leachate anaerobically with biogas as a byproduct. When produced, the biogas can be used as fuel in the boilers (B1 and B2), or it can be burned by a flare (LF1). The flare (LF1) has a minimum design VOC destruction efficiency of 98 percent. Note that the plant has never been

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

operated under this alternative and the UASB reactors and flare, LF1, have not been used.

The facility also maintains a few emissions sources that are listed as insignificant activities due to the seasonal use nature and low emission levels. The facility maintains four (4) emergency generators (EGs): one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, one (1) 30 kW Katolight (Model DFEG5938496 KW) diesel-fired EG located at Scale House, one (1) 350 kW Cummins diesel-fired EG located at Leachate Pretreatment Plant, and one (1) 40 kW Cummins (Model CD03C-1832767 KW) diesel-fired EG located at the Administration Buildings. The facility maintains three (3) propane-fired emergency generators: one (1) Onan 75 KW propane-fired EG located at Power Plant, one (1) Generac 22 KW propane-fired located at gasoline pumping station; and one (1) Generac 20 KW (propane) located across the road from Landfill. The facility also maintains various space heaters for comfort heat, various containers for the storage of butane, propane, or liquefied petroleum, or natural gas, lubricating oils, and motor vehicle gasoline. The facility also maintains a first aid and emergency medical care area with appropriate sterilization products, and medicine storage cabinets.

The following Table 1 summarizes the actual emissions from Brown Station Road Sanitary Landfill based on its Annual Emission Certification Reports:

**Table 1: Actual Emissions**

Year	NOx (TPY)	SOx (TPY)	PM <sub>10</sub> (TPY)	CO (TPY)	VOC (TPY)
2015	7.91	0.93	5.66	37.38	21.58
2016	7.96	0.99	7.11	41.78	24.03
2017	6.55	0.81	3.53	37.89	18.74
2018	6.51	1.00	6.37	38.54	25.67
2019	6.43	0.79	7.58	30.1	26.57
2020	13.50	1.48	29.95	34.88	9.75
2021	13.11	1.42	38.26	7.99	20.92

The major source thresholds for triggering Title V permitting requirements are the potential to emit 25 tons per year (TPY) of NOx, 25 TPY of VOC, or 100 TPY of any other criteria pollutant. The actual NOx and VOCs emissions from BSRSL are higher than the major source thresholds. As a result, BSRSL is required to obtain and maintain a Part 70 operating permit under COMAR 26.11.03.01.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

The current Part 70 (Title V) permit was issued to the BSRSL on November 1, 2016, with an expiration date of October 31, 2021. The BSRSL prepared a Part 70 (Title V) renewal permit application, and it was received by the Department on November 5, 2020. An administrative completeness review was conducted, and the application was deemed to be administratively complete. A completeness determination letter was sent to BSRSL on November 18, 2020 granting this facility an application shield.

**2. FACILITY INVENTORY LIST**

The following emission units have been identified as being subject to the Title V permitting requirements and having applicable requirements:

**Table 4: Emission Unit Identification**

<b>MDE Registration Number</b>	<b>Emissions Unit Number</b>	<b>Emissions Unit Description</b>	<b>Date of Registration</b>
<b>A</b>		Area A: 148-acre area of closed and capped landfill, which incorporates a LFG collection system. (Closed)	03/1968
<b>B</b>		Area B: 140-acre area of landfill containing eleven planned cells. (Active)	06/1992
<b>F1 and F2</b>	9-0821	Flare Station: Two (2) enclosed flares (F1 and F2) each rated at 45 million Btu per hour	10/1995
<b>F3</b>	033-2084-9-1361	Flare Station: F3: One (1) enclosed flare rated at 90 million Btu per hour	10/2014
<b>B1 and B2</b>	4-1621 and 4-1622	Two (2) boilers, each rated at 2.049 million Btu per hour, are located at on-site leachate pretreatment plant and are used for pre-heating leachate and the building space.	01/1997

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>MDE Registration Number</b>	<b>Emissions Unit Number</b>	<b>Emissions Unit Description</b>	<b>Date of Registration</b>
<b>LPP</b>	9-0813	The Leachate Pre-treatment Plant (LPP) pre-treats leachate from Area B before sending it to the sanitary sewer.	01/1997
<b>PP</b>	033-2084-9-1364	4.2 MW generating facility consisting of four engine generators that use LFG as primary fuel [PSC Case No. 8838, dated April 22, 2005]	04/2003
<b>GB1 and GB2</b>	5-1670	Garage Boilers: Two (2) boilers each rated at 1.01 million Btu per hour to provide building heating	Installed 07/2018. Registered 12/ 2020.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**SECTION II GENERAL CONDITIONS**

**1. DEFINITIONS**

**[COMAR 26.11.01.01] and [COMAR 26.11.02.01]**

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

**2. ACRONYMS**

ARMA	Air and Radiation Management Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

**3. EFFECTIVE DATE**

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

**4. PERMIT EXPIRATION**

**[COMAR 26.11.03.13B(2)]**

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

**5. PERMIT RENEWAL**

**[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]**

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**6. CONFIDENTIAL INFORMATION**

**[COMAR 26.11.02.02G]**

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

**7. PERMIT ACTIONS**

**[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]**

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

- a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;
- b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or
- d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

**8. PERMIT AVAILABILITY**

**[COMAR 26.11.02.13G]**

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

**9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA**

**[COMAR 26.11.03.20B]**

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

**10. TRANSFER OF PERMIT**

**[COMAR 26.11.02.02E]**

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

**11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS**

**[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]**

- a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 - .17.
- b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

- c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.
- d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

**12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS**

**[COMAR 26.11.03.17]**

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

- a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.
- b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.
- c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:
  - (1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.
- d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).
- e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.
- f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.
- g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

**13. MINOR PERMIT MODIFICATIONS**

**[COMAR 26.11.03.16]**

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

- a. A minor permit modification is a Part 70 permit revision that:
  - (1) Does not result in a violation of any applicable requirement of the Clean Air Act;
  - (2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (a) Adding new requirements,
  - (b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or
  - (c) Changing from one approved test method for a pollutant and source category to another;
- (3) Does not require or modify a:
- (a) Case-by-case determination of a federally enforceable emissions standard,
  - (b) Source specific determination for temporary sources of ambient impacts, or
  - (c) Visibility or increment analysis;
- (4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:
- (a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and
  - (b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act
- (5) Is not a Title I modification; and
- (6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.
- b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;
- (2) The proposed minor permit modification;
- (3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:
  - (a) The proposed change meets the criteria for a minor permit modification, and
  - (b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;
- (4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

- (1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.
- (2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):
  - (a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.
  - (b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.
- e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

**14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS**

**[COMAR 26.11.03.15]**

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

- a. An application for an administrative permit amendment shall:
  - (1) Be in writing;
  - (2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and
  - (3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.
- b. An administrative permit amendment:
  - (1) Is a correction of a typographical error;
  - (2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;
  - (3) requires more frequent monitoring or reporting by the Permittee;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);
  - (5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);
  - (6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);
  - (7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or
  - (8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.
- c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.
  - d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.
  - e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**15. OFF-PERMIT CHANGES TO THIS SOURCE**

**[COMAR 26.11.03.19]**

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

- a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:
  - (1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
  - (2) The change is not subject any requirements under Title IV of the Clean Air Act;
  - (3) The change is not a Title I modification; and
  - (4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.
- b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.
- c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.
- d. The Permittee shall keep a record describing:
  - (1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act, but not otherwise regulated under this permit; and
  - (2) The emissions resulting from those changes.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.
- f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.
- g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.
- h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

**16. ON-PERMIT CHANGES TO SOURCES**

**[COMAR 26.11.03.18]**

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

- a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:
  - (1) The change is not a Title I modification;
  - (2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;
  - (3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
  - (4) The change does not violate an applicable requirement of the Clean Air Act;
  - (5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;
  - (7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and
  - (8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.
- b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:
- (1) A description of the proposed change;
  - (2) The date on which the change is proposed to be made;
  - (3) Any change in emissions resulting from the change, including the pollutants emitted;
  - (4) Any new applicable requirement of the Clean Air Act; and
  - (5) Any permit term or condition that would no longer apply.
- c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.
- d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.
- e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.
- f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.
- h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

**17. FEE PAYMENT**

**[COMAR 26.11.02.16A(2) & (5)(b)]**

- a. The fee for this Part 70 permit is as prescribed in Regulation.19 of COMAR 26.11.02.
- b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.
- c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

**18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS**

**[COMAR 26.11.02.09.]**

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

- a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;
- e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;
- f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;
- g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.
- h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required b y (c.— g.) above.

**19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION**

**[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]**

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**20. PROPERTY RIGHTS**

**[COMAR 26.11.03.06E(4)]**

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

**21. SEVERABILITY**

**[COMAR 26.11.03.06A(5)]**

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

**22. INSPECTION AND ENTRY**

**[COMAR 26.11.03.06G(3)]**

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

- a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;
- b. Have access to and make copies of records required by the permit;
- c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and
- d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**23. DUTY TO PROVIDE INFORMATION**

**[COMAR 26.11.03.06E(5)]**

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

**24. COMPLIANCE REQUIREMENTS**

**[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]**

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

- a. Enforcement action,
- b. Permit revocation or revision,
- c. Denial of the renewal of a Part 70 permit, or
- d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

**25. CREDIBLE EVIDENCE**

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

**26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE**

**[COMAR 26.11.03.06E(2)]**

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

**27. CIRCUMVENTION**

**[COMAR 26.11.01.06]**

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

**28. PERMIT SHIELD**

**[COMAR 26.11.03.23]**

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

- a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;
- c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;
- d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or
- e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

**29. ALTERNATE OPERATING SCENARIOS**

**[COMAR 26.11.03.06A(9)]**

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**SECTION III PLANT WIDE CONDITIONS**

**1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION**

**[COMAR 26.11.06.03D]**

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

**2. OPEN BURNING**

**[COMAR 26.11.07]**

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

**3. AIR POLLUTION EPISODE**

**[COMAR 26.11.05.04]**

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

**4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS**

**[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]**

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

- a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;
- c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;
- d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.
- e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

**5. ACCIDENTAL RELEASE PROVISIONS**

**[COMAR 26.11.03.03B(23)] and [40 CFR 68]**

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

**6. GENERAL TESTING REQUIREMENTS**

**[COMAR 26.11.01.04]**

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

**7. EMISSIONS TEST METHODS**

**[COMAR 26.11.01.04]**

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

- a. 40 CFR 60, appendix A
- b. 40 CFR 51, appendix M
- c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

**8. EMISSIONS CERTIFICATION REPORT**

**[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and  
[COMAR 26.11.02.19D]**

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;
- b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:
  - (1) Familiar with each source for which the certifications forms are submitted, and
  - (2) Responsible for the accuracy of the emissions information;
- c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:
  - (1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
  - (2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
  - (3) Amounts, types and analyses of all fuels used;
  - (4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;
  - (5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:
    - (a) Significant maintenance performed,
    - (b) Malfunctions and downtime, and
    - (c) Episodes of reduced efficiency of all equipment;
  - (6) Limitations on source operation or any work practice standards that significantly affect emissions; and
  - (7) Other relevant information as required by the Department.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**9. COMPLIANCE CERTIFICATION REPORT**

**[COMAR 26.11.03.06G(6) and (7)]**

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

- a. The compliance certification shall include:
  - (1) The identification of each term or condition of this permit which is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether the compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of each source, currently and over the reporting period; and
  - (5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.
- b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

**10. CERTIFICATION BY RESPONSIBLE OFFICIAL**

**[COMAR 26.11.02.02F]**

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

**11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING**

**[COMAR 26.11.03.06C(5)]**

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

- a. The location as specified in this permit, and the date and time that samples and measurements are taken;
- b. All pertinent operating conditions existing at the time that samples and measurements are taken;
- c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;
- d. The identity of the Permittee, individual, or other entity that performed the analysis;
- e. The analytical techniques and methods used; and
- f. The results of each analysis.

**12. GENERAL RECORDKEEPING**

**[COMAR 26.11.03.06C(6)]**

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

These records and support information shall include:

- a. All calibration and maintenance records;
- b. All original data collected from continuous monitoring instrumentation;
- c. Records which support the annual emissions certification; and
- d. Copies of all reports required by this permit.

**13. GENERAL CONFORMITY**

**[COMAR 26.11.26.09]**

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

**14. ASBESTOS PROVISIONS**

**[40 CFR 61, Subpart M]**

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

**15. OZONE DEPLETING REGULATIONS**

**[40 CFR 82, Subpart F]**

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- d. Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.
- e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.
- f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
- g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

**16. ACID RAIN PERMIT**

Not applicable

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**SECTION IV PLANT SPECIFIC CONDITIONS**

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. **[Reference: COMAR 26.11.03.06C(5)(g)]**

The Brown Station Road Sanitary Landfill is currently subject to the following requirements:

<b>Table IV – 1</b>	
<b>1.0</b>	<p><b><u>Emissions Unit Number(s): A &amp; B</u></b></p> <p><b><u>Area A</u></b> 148-acre area of landfill is closed and capped. Area A was active from 1968 to 1992 and contains approximately 7.5 million tons of waste. It incorporates a LFG collection system. LFG from Area A is collected, sent to compressor building for treatment (compression, dehydration, and filtrations, and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.</p> <p><b><u>Area B</u></b> 140-acre area of landfill, which contains eleven planned cells. Landfilling in Area B began in 1992 and is presently ongoing. Waste has been placed in nine cells. The design capacity of the landfill is 8.5 million tons. Area B incorporates a LFG collection system. LFG from Area B is collected, sent to compressor building for treatment (compression, dehydration and filtration), and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

Table IV – 1

**1.1 Applicable Standards/Limits:**

**A. Standard for Air Emissions from Municipal Solid Waste Landfills**

**40 CFR 62, Subpart OOO**

**§62.16711 Designated facilities.**

“(a) The designated facility to which this subpart applies is each municipal solid waste landfill in each state, protectorate, and portion of Indian country that meets the conditions of paragraphs (a)(1) and (2) of this section, except for landfills exempted by paragraphs (b) and (c) of this section.

(1) The municipal solid waste landfill commenced construction, reconstruction, or modification on or before July 17, 2014.”

**§62.16712 Compliance schedule and increments of progress.**

“Planning, awarding of contracts, installing, and starting up MSW landfill air emission collection and control equipment that is capable of meeting the emission standards of §62.16714 must be completed within 30 months after the date an NMOC emission rate report shows NMOC emissions equal or exceed 34 megagrams per year; or within 30 months after the date of the most recent NMOC emission rate report that shows NMOC emissions equal or exceed 34 megagrams per year, if Tier 4 surface emissions monitoring (SEM) shows a surface emission concentration of 500 parts per million methane or greater.”

**§62.16714 Standards for municipal solid waste landfill emissions.**

**Applicability**

These emission guidelines apply to “each owner or operator of an MSW landfill having a design capacity greater than or equal to 2.5 million megagrams by mass and 2.5 million cubic meters by volume must collect and control MSW landfill emissions at each MSW landfill that meets the following conditions:

(1) Waste acceptance date. The landfill has accepted waste at any time since November 8, 1987, or has additional design capacity available for future waste deposition.

(2) Construction commencement date. The landfill commenced construction, reconstruction, or modification on or before July 17, 2014.

(3) NMOC emission rate. The landfill has an NMOC emission rate

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

greater than or equal to 34 megagrams per year or Tier 4 SEM shows a surface emission concentration of 500 parts per million methane or greater.

(4) Closed subcategory. The landfill in the closed landfill subcategory and has an NMOC emission rate greater than or equal to 50 megagrams per year.” [Reference: 40 CFR §62.16714(a)]

Collection System

The Permittee must install “a gas collection and control system meeting the requirements in paragraphs (b)(1) through (3) and (c) of this section at each MSW landfill meeting the conditions in paragraph (a) of this section.

(1) Collection system. Install and start up a collection and control system that captures the gas generated within the landfill within 30 months after:

(i) The first annual report in which the NMOC emission rate equals or exceeds 34 megagrams per year, unless Tier 2 or Tier 3 sampling demonstrates that the NMOC emission rate is less than 34 megagrams per year, as specified in § 62.16724(d)(4), or

(ii) The first annual report in which the NMOC emission rate equals or exceeds 50 megagrams per year submitted under previously applicable regulations 40 CFR part 60, subpart WWW, 40 CFR part 62, subpart GGG, or a state plan implementing 40 CFR part 60, subpart Cc for a legacy controlled landfill or landfill in the closed landfill subcategory, or

(iii) The most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year based on Tier 2, if the Tier 4 SEM shows a surface methane emission concentration of 500 parts per million methane or greater as specified in § 62.16724 (d)(4)(iii).

(2) Active. An active collection system must:

(i) Be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control system equipment.

(ii) Collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active; or 2 years or more if closed or at final grade.

(iii) Collect gas at a sufficient extraction rate.

(iv) Be designed to minimize off-site migration of subsurface gas.

(3) Passive.....” [Reference: 40 CFR §62.16714(b)(3)]

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

Control System.

The Permittee must "control the gas collected from within the landfill through the use of control devices meeting the following requirements, except as provided in 40 CFR 60.24.

- (1) A non-enclosed flare designed and operated in accordance with the parameters established in 40 CFR 60.18 except as noted in § 62.16722(d); or
- (2) 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 or less. The reduction efficiency or concentration in parts-per-million by volume must 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 § 62.16718(d). The performance test is not required for boilers and process heaters with design heat input capacities equal to or greater than 44 megawatts that burn landfill gas for compliance with this subpart.
  - (i) If a boiler or process heater is used as the control device, the landfill gas stream must be introduced into the flame zone.
  - (ii) The control device must be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in § 62.16722.
  - (iii) Legacy controlled landfills or landfills in the closed landfill subcategory that have already installed control systems and completed initial or subsequent performance tests may comply with this subpart using the initial or most recent performance test conducted to comply with 40 CFR part 60, subpart WWW; subpart GGG of this part; or a state plan implementing subpart Cc of part 60, is sufficient for compliance with this subpart." **[Reference: 40 CFR §62.16714(c)]**
- (3) The Permittee must "route the collected gas to a treatment system that processes the collected gas for subsequent sale or beneficial use such as fuel for combustion, production of vehicle fuel, production of high-Btu gas for pipeline injection, or use as a raw

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

material in a chemical manufacturing process. Venting of treated landfill gas to the ambient air is not allowed. If the treated landfill gas cannot be routed for subsequent sale or beneficial use, then the treated landfill gas must be controlled according to either paragraph (c)(1) or (2) of this section. **[Reference: 40 CFR §62.16714(c)(1)]**

- (4) All emissions from any atmospheric vent from the gas treatment system are subject to the requirements of paragraph (b) or (c) of this section. For purposes of this subpart, atmospheric vents located on the condensate storage tank are not part of the treatment system and are exempt from the requirements of paragraph (b) or (c) of this section. **[Reference: 40 CFR §62.16714(c)(4)]**

Design Capacity.

“Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume must submit an initial design capacity report to the Administrator as provided in § 62.16724(a). The landfill may calculate design capacity in either megagrams or cubic meters for comparison with the exemption values. Any density conversions must be documented and submitted with the report.

Submittal of the initial design capacity report fulfills the requirements of this subpart except as provided in paragraphs (d)(1) and (2) of this section.

(1) ....

(2) When an increase in the maximum design capacity of a landfill with an initial design capacity less than 2.5 million megagrams or 2.5 million cubic meters results in a revised maximum design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, the owner or operator must comply with paragraph (e) of this section.”

**[Reference: 40 CFR §62.16714(d)]**

Emissions.

“The owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must either install a collection and control system as provided in paragraphs (b) and (c) of this section or calculate an initial NMOC emission rate for the landfill using the procedures specified in § 62.16718(a). The NMOC emission rate must be recalculated annually, except as provided in § 62.16724(c)(3).

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

(1) If the calculated NMOC emission rate is less than 34 megagrams per year, the owner or operator must:

- (i) Submit an annual NMOC emission rate report according to § 62.16724(c), except as provided in § 62.16724(c)(3); and
- (ii) Recalculate the NMOC emission rate annually using the procedures specified in § 62.16724(a) until such time as the calculated NMOC emission rate is equal to or greater than 34 megagrams per year, or the landfill is closed.

(A) If the calculated NMOC emission rate, upon initial calculation or annual recalculation required in paragraph (e)(1)(ii) of this section, is equal to or greater than 34 megagrams per year, the owner or operator must either: Comply with paragraphs (b) and (c) of this section; calculate NMOC emissions using the next higher tier in § 62.16718; or conduct a surface emission monitoring demonstration using the procedures specified in § 62.16718(a)(6).

(2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either: Submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in § 62.16724(d), except for exemptions allowed under § 62.16711(g)(3); calculate NMOC emissions using a higher tier in § 62.16718; or conduct a surface emission monitoring demonstration using the procedures specified in § 62.16718(a)(6). **[Reference: 40 CFR §62.16714(e)]**

**B. Operational Standards for Collection and Control Systems – [40 CFR §60.34f]**

The Permittee or operator "of an MSW landfill with a gas collection and control system used to comply with the provisions of § 62.16714(b) and (c) must:

(a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for:

- (1) 5 years or more if active; or
- (2) 2 years or more if closed or at final grade;

(b) Operate the collection system with negative pressure at each

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

wellhead except under the following conditions:

(1) A fire or increased well temperature. The owner or operator must record instances when positive pressure occurs in efforts to avoid a fire. These records must be submitted with the annual reports as provided in § 62.16724(h)(1);

(2) Use of a geomembrane or synthetic cover. The owner or operator must develop acceptable pressure limits in the design plan;

(3) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes must be approved by the Administrator as specified in § 62.16724(d);

(c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the Administrator for approval and must include supporting data demonstrating that the elevated parameter neither causes fires nor significantly inhibits anaerobic decomposition by killing methanogens. The demonstration must satisfy both criteria in order to be approved (i.e., neither causing fires nor killing methanogens is acceptable).

(d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator must conduct surface testing using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in § 62.16720(d). The owner or operator must conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at no more than 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover and all cover penetrations. Thus, the owner or operator must monitor any openings that are within an area of the landfill where waste has been placed and a gas collection system is required. The owner or operator may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan must be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

	<p>dangerous areas may be excluded from the surface testing.</p> <p>(e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with § 62.16714(c). In the event the collection or control system is not operating, the gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within 1 hour of the collection or control system not operating.</p> <p>(f) Operate the control system at all times when the collected gas is routed to the system.</p> <p>(g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action must be taken as specified in § 62.16720(a)(3) and (5) or § 62.16720(c). If corrective actions are taken as specified in § 62.16720, the monitored exceedance is not a violation of the operational requirements in this section.” <b>[Reference: 40 CFR §62.16716(a) thru (g)]</b></p> <p><b>C. <u>Particulate Matter from Materials Handling and Construction.</u></b>        “A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:        (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.” <b>[Reference: COMAR 26.11.06.03D]</b></p>
<b>1.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Standards for Air Emissions from Municipal Solid Waste Landfills</u></b></p> <p><b>§60.35f Test methods and procedures.</b></p> <p>The Permittee must use the “provisions in this section to calculate the landfill NMOC emission rate and conduct a surface emission monitoring demonstration.</p> <p>(a)(1) NMOC Emission Rate. The landfill owner or operator must</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

calculate the NMOC emission rate using either Equation 1 provided in paragraph (a)(1)(i) of this section or Equation 2 provided in paragraph (a)(1)(ii) of this section. Both Equation 1 and Equation 2 may be used if the actual year-to-year solid waste acceptance rate is known, as specified in paragraph (a)(1)(i) of this section, for part of the life of the landfill and the actual year-to-year solid waste acceptance rate is unknown, as specified in paragraph (a)(1)(ii) of this section, for part of the life of the landfill. The values to be used in both Equation 1 and Equation 2 are 0.05 per year for  $k$ , 170 cubic meters per megagram for  $L_o$ , and 4,000 parts per million by volume as hexane for the  $C_{NMOC}$ . For landfills located in geographical areas with a 30-year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the  $k$  value to be used is 0.02 per year.

(i)(A) Equation 1 must be used if the actual year-to-year solid waste acceptance rate is known.

$$M_{NMOC} = \sum_{ni} = 2kL_oM_i (e^{-kt_i}) (C_{NMOC}) (3.6 \times 10^{-9}) \quad (\text{Eq. 1})$$

Where:

$M_{NMOC}$  = Total NMOC emission rate from the landfill, megagrams per year.

$k$  = Methane generation rate constant, year<sup>-1</sup>.

$L_o$  = Methane generation potential, cubic meters per megagram solid waste.

$M_i$  = Mass of solid waste in the  $i^{\text{th}}$  section, megagrams.

$t_i$  = Age of the  $i^{\text{th}}$  section, years.

$C_{NMOC}$  = Concentration of NMOC, parts per million by volume as hexane.

$3.6 \times 10^{-9}$  = Conversion factor.

(B) The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for  $M_i$  if documentation of the nature and amount of such wastes is maintained.

(ii)(A) Equation 2 must be used if the actual year-to-year solid waste acceptance rate is unknown.

$$M_{NMOC} = 2 L_o R (e^{-kc} - e^{-kt}) C_{NMOC} (3.6 \times 10^{-9}) \quad (\text{Eq. 2})$$

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

Where:

$M_{NMOC}$  = Mass emission rate of NMOC, megagrams per year.

$L_0$  = Methane generation potential, cubic meters per megagram solid waste.

R = Average annual acceptance rate, megagrams per year.

k = Methane generation rate constant, year<sup>-1</sup>.

t = Age of landfill, years.

$C_{NMOC}$  = Concentration of NMOC, parts per million by volume as hexane.

c = Time since closure, years; for active landfill c = 0 and e<sup>-kc</sup> = 1.

$3.6 \times 10^{-9}$  = Conversion factor.

(B) The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value of R, if documentation of the nature and amount of such wastes is maintained.

(2) Tier 1. The owner or operator must compare the calculated NMOC mass emission rate to the standard of 34 megagrams per year.

(i) If the NMOC emission rate calculated in paragraph (a)(1) of this section is less than 34 megagrams per year, then the owner or operator must submit an NMOC emission rate report according to §62.16724(c) and must recalculate the NMOC mass emission rate annually as required under §62.16714(e).

(ii) If the NMOC emission rate calculated in paragraph (a)(1) of this section is equal to or greater than 34 megagrams per year, then the landfill owner or operator must either:

(A) Submit a gas collection and control system design plan within 1 year as specified in §62.16724(d) and install and operate a gas collection and control system within 30 months according to §62.16714(b) and (c);

(B) Determine a site-specific NMOC concentration and recalculate the NMOC emission rate using the Tier 2 procedures provided in paragraph (a)(3) of this section; or

(C) Determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using the Tier 3 procedures provided in paragraph (a)(4) of this section.

(3) Tier 2. The landfill owner or operator must determine the site-specific NMOC concentration using the following sampling

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

procedure. The landfill owner or operator must install at least two sample probes per hectare, evenly distributed over the landfill surface that has retained waste for at least 2 years. If the landfill is larger than 25 hectares in area, only 50 samples are required. The probes should be evenly distributed across the sample area. The sample probes should be located to avoid known areas of nondegradable solid waste. The owner or operator must collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using EPA Method 25 or 25C of appendix A-7 of 40 CFR part 60. Taking composite samples from different probes into a single cylinder is allowed; however, equal sample volumes must be taken from each probe. For each composite, the sampling rate, collection times, beginning and ending cylinder vacuums, or alternative volume measurements must be recorded to verify that composite volumes are equal. Composite sample volumes should not be less than one liter unless evidence can be provided to substantiate the accuracy of smaller volumes. Terminate compositing before the cylinder approaches ambient pressure where measurement accuracy diminishes. If more than the required number of samples is taken, all samples must be used in the analysis. The landfill owner or operator must divide the NMOC concentration from EPA Method 25 or 25C of appendix A-7 of 40 CFR part 60 by 6 to convert from C as carbon to C as hexane. If the landfill has an active or passive gas removal system in place, EPA Method 25 or 25C samples may be collected from these systems instead of surface probes provided the removal system can be shown to provide sampling as representative as the two sampling probes per hectare requirement. For active collection systems, samples may be collected from the common header pipe. The sample location on the common header pipe must be before any gas moving, condensate removal, or treatment system equipment. For active collection systems, a minimum of three samples must be collected from the header pipe.

- (i) Within 60 days after the date of determining the NMOC concentration and corresponding NMOC emission rate, the owner or operator must submit the results according to §62.16724(j)(2).
- (ii) The landfill owner or operator must recalculate the NMOC mass emission rate using Equation 1 or Equation 2 provided in paragraph (a)(1)(i) or (ii) of this section using the average site-specific NMOC concentration from the collected samples instead of the default value provided in paragraph (a)(1) of this section.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

- (iii) If the resulting NMOC mass emission rate is less than 34 megagrams per year, then the owner or operator must submit a periodic estimate of NMOC emissions in an NMOC emission rate report according to §62.16724(c), and must recalculate the NMOC mass emission rate annually as required under §62.16714(e). The site-specific NMOC concentration must be retested every 5 years using the methods specified in this section.
  
- (iv) If the NMOC mass emission rate as calculated using the Tier 2 site-specific NMOC concentration is equal to or greater than 34 megagrams per year, the owner or operator must either:
  - (A) Submit a gas collection and control system design plan within 1 year as specified in §62.16724(d) and install and operate a gas collection and control system within 30 months according to §62.16714(b) and (c);
  - (B) Determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate using the Tier 3 procedures specified in paragraph (a)(4) of this section; or
  - (C) Conduct a surface emission monitoring demonstration using the Tier 4 procedures specified in paragraph (a)(6) of this section.
  
- (4) Tier 3. The site-specific methane generation rate constant must be determined using the procedures provided in EPA Method 2E of appendix A-1 of 40 CFR part 60. The landfill owner or operator must estimate the NMOC mass emission rate using Equation 1 or Equation 2 in paragraph (a)(1)(i) or (ii) of this section and using a site-specific methane generation rate constant, and the site-specific NMOC concentration as determined in paragraph (a)(3) of this section instead of the default values provided in paragraph (a)(1) of this section. The landfill owner or operator must compare the resulting NMOC mass emission rate to the standard of 34 megagrams per year.
  
- (i) If the NMOC mass emission rate as calculated using the Tier 2 site-specific NMOC concentration and Tier 3 site-specific methane generation rate is equal to or greater than 34 megagrams per year, the owner or operator must either: (A) Submit a gas collection and control system design plan within 1 year as specified in § 62.16724(d) and install and operate a gas collection and control system within 30 months according to § 62.16714(b) and (c); or (B) Conduct a surface emission monitoring demonstration using the Tier

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

4 procedures specified in paragraph (a)(6) of this section.

- (ii) If the NMOC mass emission rate is less than 34 megagrams per year, then the owner or operator must recalculate the NMOC mass emission rate annually using Equation 1 or Equation 2 in paragraph (a)(1) of this section and using the site-specific Tier 2 NMOC concentration and Tier 3 methane generation rate constant and submit a periodic NMOC emission rate report as provided in § 62.16724(c). The calculation of the methane generation rate constant is performed only once, and the value obtained from this test must be used in all subsequent annual NMOC emission rate calculations.
- (5) Alternative methods. The owner or operator may use other methods to determine the NMOC concentration or a site specific methane generation rate constant as an alternative to the methods required in paragraphs (a)(3) and (4) of this section if the method has been approved by the Administrator.
- (6) Tier 4. Demonstrate that surface methane emissions are below 500 parts per million. Surface emission monitoring must be conducted on a quarterly basis using the following procedures. Tier 4 is allowed only if the landfill owner or operator can demonstrate that NMOC emissions are greater than or equal to 34 megagrams per year but less than 50 megagrams per year using Tier 1 or Tier 2. If both Tier 1 and Tier 2 indicate NMOC emissions are megagrams per year or greater, then Tier 4 cannot be used. In addition, the landfill must meet the criteria in paragraph (a)(6)(viii) of this section.
  - (i) Measure surface concentrations of methane along the entire perimeter of the landfill and along a pattern that traverses the landfill at no more than 30-meter intervals using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in § 62.16720(d).
  - (ii) The background concentration must be determined by moving the probe inlet upwind and downwind at least 30 meters from the waste mass boundary of the landfill.
  - (iii) Surface emission monitoring must be performed in accordance with section 8.3.1 of EPA Method 21 of appendix A-7 of 40 CFR part 60, except that the probe inlet must be placed no more than 5 centimeters above the landfill surface; the constant measurement of

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

distance above the surface should be based on a mechanical device such as with a wheel on a pole.

- (A) The owner or operator must use a wind barrier, similar to a funnel, when onsite average wind speed exceeds 4 miles per hour or 2 meters per second or gust exceeding 10 miles per hour. Average on-site wind speed must also be determined in an open area at 5-minute intervals using an on-site anemometer with a continuous recorder and data logger for the entire duration of the monitoring event. The wind barrier must surround the SEM monitor, and must be placed on the ground, to ensure wind turbulence is blocked. The SEM cannot be conducted if average wind speed exceeds 25 miles per hour.
- (B) Landfill surface areas where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover, and all cover penetrations must also be monitored using a device meeting the specifications provided in § 62.16720(d).
- (iv) Each owner or operator seeking to comply with the Tier 4 provisions in paragraph (a)(6) of this section must maintain records of surface emission monitoring as provided in § 62.16726(g) and submit a Tier 4 surface emissions report as provided in § 62.16724(d)(4)(iii).
- (v) If there is any measured concentration of methane of 500 parts per million or greater from the surface of the landfill, the owner or operator must submit a gas collection and control system design plan within 1 year of the first measured concentration of methane of 500 parts per million or greater from the surface of the landfill according to § 62.16724(d) and install and operate a gas collection and control system according to § 62.16714(b) and (c) within 30 months of the most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year based on Tier 2.
- (vi) If after four consecutive quarterly monitoring periods at a landfill, other than a closed landfill, there is no measured concentration of methane of 500 parts per million or greater from the surface of the landfill, the owner or operator must continue quarterly surface emission monitoring using the methods specified in this section. (vii) If after four consecutive quarterly monitoring periods at a closed landfill there is no measured concentration of methane of 500 parts

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

per million or greater from the surface of the landfill, the owner or operator must conduct annual surface emission monitoring using the methods specified in this section.

(viii) If a landfill has installed and operates a collection and control system that is not required by this subpart, then the collection and control system must meet the following criteria:

(A) The gas collection and control system must have operated for at least 6,570 out of 8,760 hours preceding the Tier 4 SEM demonstration.

(B) During the Tier 4 SEM demonstration, the gas collection and control system must operate as it normally would to collect and control as much landfill gas as possible.

(b) After the installation and startup of a collection and control system in compliance with this subpart, the owner or operator must calculate the NMOC emission rate for purposes of determining when the system can be capped, removed, or decommissioned as provided in §62.16714(f), using Equation 3:

$$M_{\text{NMOC}} = 1.89 \times 10^{-3} Q_{\text{LFG}} C_{\text{NMOC}} \quad (\text{Eq. 3})$$

Where:

$M_{\text{NMOC}}$  = Mass emission rate of NMOC, megagrams per year.

$Q_{\text{LFG}}$  = Flow rate of landfill gas, cubic meters per minute.

$C_{\text{NMOC}}$  = NMOC concentration, parts per million by volume as hexane.

(1) The flow rate of landfill gas,  $Q_{\text{LFG}}$ , must be determined by measuring the total landfill gas flow rate at the common header pipe that leads to the control system using a gas flow measuring device calibrated according to the provisions of section 10 of EPA Method 2E of appendix A-1 of 40 CFR part 60.

(2) NMOC concentration. The average NMOC concentration,  $C$  must be determined by collecting and analyzing landfill gas sampled from the common header pipe before the gas moving or condensate removal equipment using the procedures in EPA Method 25 or EPA Method 25C of appendix A-7 of 40 CFR part 60. The sample location on the common header pipe must be before any condensate removal or other gas refining units. The landfill owner or operator must divide

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

the NMOC concentration from EPA Method 25 or EPA Method 25C of appendix A-7 of 40 CFR part 60 by six to convert from C as carbon to C as hexane.

(3) Gas flow rate method. The owner or operator may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Administrator.

(i) Within 60 days after the date of calculating the NMOC emission rate for purposes of determining when the system can be capped or removed, the owner or operator must submit the results according to § 62.16724(j) (2).

(ii) [Reserved]

(c) When calculating emissions for Prevention of Significant Deterioration purposes, the owner or operator of each MSW landfill subject to the provisions of this subpart must estimate the NMOC emission rate for comparison to the Prevention of Significant Deterioration major source and significance levels in §§ 51.166 or 52.21 of this chapter using Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources (AP-42) or other approved measurement procedures.

(d) For the performance test required in § 62.16714(c)(1), the net heating value of the combusted landfill gas as determined in 40 CFR 60.18(f)(3) of this chapter is calculated from the concentration of methane in the landfill gas as measured by EPA Method 3C. A minimum of three 30-minute EPA Method 3C samples are determined. The measurement of other organic components, hydrogen, and carbon monoxide is not applicable. EPA Method 3C may be used to determine the landfill gas molecular weight for calculating the flare gas exit velocity under 40 CFR 60.18(f)(4) of this chapter.

(1) Performance test results. Within 60 days after the date of completing each performance test (as defined in § 60.8 of this chapter), the owner or operator must submit the results of the performance tests required by paragraph (b) or (d) of this section, including any associated fuel analyses, according to § 62.16724(j)(1).

(2) [Reserved]

(e) For the performance test required in § 62.16714(c)(2), EPA Method 25 or 25C (EPA Method 25C may be used at the inlet only) of appendix A-7 of 40 CFR part 60 must be used to determine compliance with the 98 weight-percent efficiency or the 20 parts-per-million by volume outlet

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

NMOC concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by § 62.16724(d)(2). EPA Method 3, 3A, or 3C of appendix A-2 of 40 CFR part 60 must be used to determine oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 parts-per-million NMOC as carbon (8 parts-per-million NMOC as hexane), EPA Method 25A should be used in place of EPA Method 25. EPA Method 18 of appendix A-6 of 40 CFR part 60 may be used in conjunction with EPA Method 25A on a limited basis (compound specific, e.g., methane) or EPA Method 3C may be used to determine methane. The methane as carbon should be subtracted from the EPA Method 25A total hydrocarbon value as carbon to give NMOC concentration as carbon. The landfill owner or operator must divide the NMOC concentration as carbon by 6 to convert the C as carbon to C as hexane. Equation 4 must be used to calculate efficiency:

$$\text{Control Efficiency} = (\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / (\text{NMOC}_{\text{in}}) \quad (\text{Eq. 4})$$

Where:

$\text{NMOC}_{\text{in}}$  = Mass of NMOC entering control device.

$\text{NMOC}_{\text{out}}$  = Mass of NMOC exiting control device.

(1) Within 60 days after the date of completing each performance test (as defined in §60.8), the owner or operator must submit the results of the performance tests, including any associated fuel analyses, according to §60.38f(j)(1)."

(2) [Reserved]

**[Reference: 40 CFR §62.16718(a) thru (e)]**

**B. Operational Standards for Collection and Control Systems**

The Permittee must follow the appropriate "compliance provisions in this section.

(a) Except as provided in §62.16724(d)(2), the specified methods in paragraphs (a)(1) through (6) of this section must be used to determine whether the gas collection system is in compliance with §62.16714(b)(2).

(1) For the purposes of calculating the maximum expected gas

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

generation flow rate from the landfill to determine compliance with § 62.16714(b)(2)(i), either Equation 5 or Equation 6 must be used. The methane generation rate constant (k) and methane generation potential (Lo) kinetic factors should be those published in the most recent AP 42 or other site-specific values demonstrated to be appropriate and approved by the Administrator. If k has been determined as specified in § 62.16718(a)(4), the value of k determined from the test must be used. A value of no more than 15 years must be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure.

(i) For sites with unknown year-to-year solid waste acceptance rate:

$$Q_m = 2 L_o R (e^{-kc} - e^{-kt}) \quad (\text{Eq. 5})$$

Where:

$Q_m$  = Maximum expected gas generation flow rate, cubic meters per year.

$L_o$  = Methane generation potential, cubic meters per megagram solid waste.

$R$  = Average annual acceptance rate, megagrams per year.

$k$  = Methane generation rate constant, year<sup>-1</sup>.

$t$  = Age of the landfill at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less. If the equipment is installed after closure,  $t$  is the age of the landfill at installation, years.

$c$  = Time since closure, years (for an active landfill  $c = 0$  and  $e^{-kc} = 1$ ).

(ii) For sites with known year-to-year solid waste acceptance rate:

$$Q_M = \sum_{ni} = 2 k L_o M_i (e^{-kt_i}) \quad (\text{Eq. 6})$$

Where:

$Q_M$  = Maximum expected gas generation flow rate, cubic meters per year.

$k$  = Methane generation rate constant, year<sup>-1</sup>.

$L_o$  = Methane generation potential, cubic meters per megagram solid waste.

$M_i$  = Mass of solid waste in the  $i^{\text{th}}$  section, megagrams.

$t_i$  = Age of the  $i^{\text{th}}$  section, years.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

- (iii) If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, Equation 5 or Equation 6 in paragraph (a)(1)(i) or (ii) of this section. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using Equation 5 or Equation 6 or other methods must be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment.
- (2) For the purposes of determining sufficient density of gas collectors for compliance with §62.16714(b)(2)(ii), the owner or operator must design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Administrator, capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.
- (3) For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with §62.16714(b)(2)(iii), the owner or operator must measure gauge pressure in the gas collection header applied to each individual well monthly. If a positive pressure exists, action must be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under §62.16716(b). Any attempted corrective measure must not cause exceedances of other operational or performance standards.
- (i) If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement of positive pressure, the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but not later than 60 days after positive pressure was first measured. The owner or operator must keep records according to §62.16726(e)(3).
- (ii) If corrective actions cannot be fully implemented within 60 days following the positive pressure or elevated temperature measurement for which the root cause analysis was required, the owner or operator must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the measurement of landfill gas temperature greater than 55 degrees Celsius (131 degrees Fahrenheit) or positive pressure.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

The owner or operator must submit the items listed in § 62.16724(h)(7) as part of the next annual report. The owner or operator must keep records according to § 62.16726(e)(4).

- (iii) If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 62.16724(h)(7) and (k). The owner or operator must keep records according to § 62.16726(e)(5).
- (4) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator must monitor each well monthly for temperature as provided in §62.16716(c). If a well exceeds the operating parameter for temperature, action must be initiated to correct the exceedance within 5 calendar days. Any attempted corrective measure must not cause exceedances of other operational or performance standards.
- (i) If a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit) cannot be achieved within 15 calendar days of the first measurement of landfill gas temperature greater than 55 degrees Celsius (131 degrees Fahrenheit), the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after a landfill gas temperature greater than 55 degrees Celsius (131 degrees Fahrenheit) was first measured. The owner or operator must keep records according to § 62.16726(e)(3).
- (ii) If corrective actions cannot be fully implemented within 60 days following the measurement of landfill gas temperature greater than 55 degrees Celsius (131 degrees Fahrenheit) for which the root cause analysis was required, the owner or operator must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the measurement of landfill gas temperature greater than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator must submit the items listed in § 62.16724(h)(7) as part of the next annual report. The owner or operator must keep records according to § 62.16726(e)(4).
- (iii) If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 62.16724(h)(7) and § 62.16724(k). The owner or operator must keep records according to § 62.16726(e)(5).

(5) An owner or operator seeking to demonstrate compliance with § 62.16714(b)(2)(iv) through the use of a collection system not conforming to the specifications provided in § 62.16728 must provide information satisfactory to the Administrator as specified in § 62.16724(d)(3) demonstrating that off-site migration is being controlled.

(b) For purposes of compliance with § 62.16716(a), each owner or operator of a controlled landfill must place each well or design component as specified in the approved design plan as provided in § 62.16724(d). Each well must be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of:

- (1) 5 years or more if active; or
- (2) 2 years or more if closed or at final grade.

(c) The following procedures must be used for compliance with the surface methane operational standard as provided in § 62.16716(d):

(1) After installation and startup of the gas collection system, the owner or operator must monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at no more than 30-meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in paragraph (d) of this section.

(2) The background concentration must be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.

(3) Surface emission monitoring must be performed in accordance with section 8.3.1 of EPA Method 21 of appendix A 7 of 40 CFR part 60, except that the probe inlet must be placed within 5 to 10 centimeters of the ground. Monitoring must be performed during typical meteorological conditions.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

- |  |  |
|--|--|
|  | <p>(4) Any reading of 500 parts per million or more above background at any location must be recorded as a monitored exceedance and the actions specified in paragraphs (c)(4)(i) through (v) of this section must be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of § 62.16716(d).</p> <ul style="list-style-type: none"><li>(i) The location of each monitored exceedance must be marked, and the location and concentration recorded. For location, you must determine the latitude and longitude coordinates using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places.</li><li>(ii) Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance must be made and the location must be re-monitored within 10 calendar days of detecting the exceedance.</li><li>(iii) If the re-monitoring of the location shows a second exceedance, additional corrective action must be taken, and the location must be monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in paragraph (c)(4)(v) of this section must be taken, and no further monitoring of that location is required until the action specified in paragraph (c) (4)(v) of this section has been taken.</li><li>(iv) Any location that initially showed an exceedance but has a methane concentration less than 500 parts-per million methane above background at the 10-day re-monitoring specified in paragraph (c)(4)(ii) or (iii) of this section must be re-monitored 1 month from the initial exceedance. If the 1-month re-monitoring shows a concentration less than 500 parts-per-million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month re-monitoring shows an exceedance, the actions specified in paragraph (c)(4)(iii) or (v) of this section must be taken.</li><li>(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 must be installed within 120 calendar days of the initial</li></ul> |
|--|--|

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

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.

(5) The owner or operator must implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

(d) Each owner or operator seeking to comply with the provisions in paragraph (c) of this section or § 62.16718(a)(6) must comply with the following instrumentation specifications and procedures for surface emission monitoring devices:

(1) The portable analyzer must meet the instrument specifications provided in section 6 of EPA Method 21 of appendix A-7 of 40 CFR part 60, except that "methane" replaces all references to "VOC."

(2) The calibration gas must be methane, diluted to a nominal concentration of 500 parts-per-million in air.

(3) To meet the performance evaluation requirements in section 8.1 of EPA Method 21 of appendix A-7 of 40 CFR part 60, the instrument evaluation procedures of section 8.1 of EPA Method 21 of appendix A-7 of 40 CFR part 60 must be used.

(4) The calibration procedures provided in sections 8 and 10 of EPA Method 21 of appendix A-7 of 40 CFR part 60 must be followed immediately before commencing a surface monitoring survey.

(e) The provisions of this subpart apply at all times, including periods of startup, shutdown, or malfunction. During periods of startup, shutdown, and malfunction, you must comply with the work practice specified in § 62.16716(e) in lieu of the compliance provisions in §62.16720."

**[Reference: 40 CFR §62.16720(a) thru (e)]**

**C. Particulate Matter from Materials Handling and Construction.**

See Record Keeping Requirements in Section 1.4.C.

**1.3 Monitoring Requirements:**

**A. Standards for Air Emissions from Municipal Solid Waste Landfills**

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

See Monitoring Requirements in Section 1.3.B.

**B. Operational Standards for Collection and Control Systems**

**§62.16722 Monitoring of operations.**

The Permittee must follow the appropriate "monitoring provisions in this section, except as provided in §62.16722.

(a) Each owner or operator seeking to comply with § 62.16714(b)(2) for an active gas collection system must install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:

(1) Measure the gauge pressure in the gas collection header on a monthly basis as provided in § 62.16720(a)(3); and

(2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as follows:

(i) The nitrogen level must be determined using EPA Method 3C of appendix A-2 of 40 CFR part 60, unless an alternative test method is established as allowed by § 62.16724(d)(2).

(ii) Unless an alternative test method is established as allowed by § 62.16724(d)(2), the oxygen level must be determined by an oxygen meter using EPA Method 3A of appendix A-7 of 40 CFR part 60, EPA Method 3C of appendix A-7 of 40 CFR part 60, or ASTM D6522-11. Determine the oxygen level by an oxygen meter using EPA Method 3A, 3C, or ASTM D6522-11 (if sample location is prior to combustion) except that:

(A) The span must be set between 10- and 12-percent oxygen;

(B) A data recorder is not required;

(C) Only two calibration gases are required, a zero and span;

(D) A calibration error check is not required;

(E) The allowable sample bias, zero drift, and calibration drift are  $\pm 10$  percent.

(iii) A portable gas composition analyzer may be used to monitor the

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

oxygen levels provided:

(A) The analyzer is calibrated; and

(B) The analyzer meets all quality assurance and quality control requirements for EPA Method 3A or ASTM D6522-11.

(3) Monitor temperature of the landfill gas on a monthly basis as provided in § 62.16720(a)(4). The temperature measuring device must be calibrated annually using the procedure in 40 CFR part 60, appendix A-1, EPA Method 2, section 10.3.

(b) Each owner or operator seeking to comply with § 62.16714(c) using an enclosed combustor must calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment:

(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of  $\pm 1$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 0.5$  degrees Celsius, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity equal to or greater than 44 megawatts.

(2) A device that records flow to the control device and bypass of the control device (if applicable). The owner or operator must:

(i) Install, calibrate, and maintain a gas flow rate measuring device that must record the flow to the control device at least every 15 minutes; and

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

(c) Each owner or operator seeking to comply with § 62.16714(c) using a non-enclosed flare must install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(1) A heat sensing device, such as an ultraviolet beam sensor or

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

(2) A device that records flow to the flare and bypass of the flare (if applicable). The owner or operator must:

(i) Install, calibrate, and maintain a gas flow rate measuring device that records the flow to the control device at least every 15 minutes; and

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

(d) Each owner or operator seeking to demonstrate compliance with § 62.16714(c) using a device other than a non-enclosed flare or an enclosed combustor or a treatment system must provide information satisfactory to the Administrator as provided in § 62.16724(d)(2) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Administrator must review the information and either approve it, or request that additional information be submitted. The Administrator may specify additional appropriate monitoring procedures.

(e) Each owner or operator seeking to install a collection system that does not meet the specifications in § 62.16728 or seeking to monitor alternative parameters to those required by § 62.16716 through § 62.16722 must provide information satisfactory to the Administrator as provided in § 62.16724(d)(2) and (3) describing the design and operation of the collection system, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Administrator may specify additional appropriate monitoring procedures.

(f) Each owner or operator seeking to demonstrate compliance with the 500 parts-per-million surface methane operational standard in § 62.16716(d) must monitor surface concentrations of methane according to the procedures provided in § 62.16720(c) and the instrument specifications in § 62.16720(d). Any closed landfill that

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 parts-per-million or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.

- (g) Each owner or operator seeking to demonstrate compliance with the control system requirements in § 62.16714(c) using a landfill gas treatment system must maintain and operate all monitoring systems associated with the treatment system in accordance with the site-specific treatment system monitoring plan required in § 62.16726(b)(5)(ii) and must calibrate, maintain, and operate according to the manufacturer's specifications a device that records flow to the treatment system and bypass of the treatment system (if applicable). The owner or operator must:

(1) Install, calibrate, and maintain a gas flow rate measuring device that records the flow to the treatment system at least every 15 minutes; and

(2) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

- (h) The monitoring requirements of paragraphs (b), (c), (d), and (g) of this section apply at all times the designated facility is operating, except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. You are required to complete monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable." **[Reference: 40 CFR §62.16722(a) thru (h)]**

**C. Particulate Matter from Materials Handling and Construction.**

Permittee shall maintain and update the current plan that contains an explanation of reasonable precautions or best management practices

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 1</b>	
	(BMPs) that will be used to prevent particulate matter from becoming airborne. The Permittee shall perform a semi-annual inspection of the operation to verify that the reasonable precautions (BMPs) are being implemented. <b>[Reference: COMAR 26.11.03.06C]</b>
<b>1.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><b>A. <u>Standards for Air Emissions from Municipal Solid Waste Landfills</u></b></p> <p>See Record Keeping Requirements in Section 1.4.B.</p> <p><b>B. <u>Operational Standards for Collection and Control Systems</u></b></p> <p><b>§62.16724 Recordkeeping guidelines.</b></p> <p>The Permittee must follow the appropriate “recordkeeping provisions in this section.</p> <p>(a) Except as provided in § 62.16724(d)(2), each owner or operator of an MSW landfill subject to the provisions of § 62.16714(e) must keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report that triggered § 62.16714(e), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.</p> <p>(b) Except as provided in § 62.16724(d)(2), each owner or operator of a controlled landfill must keep up-to-date, readily accessible records for the life of the control system equipment of the data listed in paragraphs (b)(1) through (5) of this section as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years. Records of the control device vendor specifications must be maintained until removal.</p> <p>(1) Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with §62.16714(b):</p> <p>(i) The maximum expected gas generation flow rate as calculated in §62.16720(a)(1). The owner or operator may use another method to determine the maximum gas generation flow rate, if the method has been approved by the</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

Administrator.

- (ii) The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in §62.16728(a)(1).
- (2) Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with §60.33f(c) through use of an enclosed combustion device other than a boiler or process heater with a design heat input capacity equal to or greater than 44 megawatts:
- (i) The average temperature measured at least every 15 minutes and averaged over the same time period of the performance test.
  - (ii) The percent reduction of NMOC determined as specified in §62.16714(c)(2) achieved by the control device.
- (3) Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with §62.16714(c)(2)(i) through use of a boiler or process heater of any size: A description of the location at which the collected gas vent stream is introduced into the boiler or process heater over the same time period of the performance testing.
- (4) Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with §62.16714(c)(1) through use of a non-enclosed flare, the flare type (i.e., steam-assisted, air-assisted, or non-assisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in §60.18; and continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame or the flare flame is absent.
- (5) Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with §62.16714(c)(3) through use of a landfill gas treatment system:
- (i) Bypass records. Records of the flow of landfill gas to, and bypass of, the treatment system.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

(ii) Site-specific treatment monitoring plan, to include:

- (A) Monitoring records of parameters that are identified in the treatment system monitoring plan and that ensure the treatment system is operating properly for each intended end use of the treated landfill gas. At a minimum, records should include records of filtration, de-watering, and compression parameters that ensure the treatment system is operating properly for each intended end use of the treated landfill gas.
- (B) Monitoring methods, frequencies, and operating ranges for each monitored operating parameter based on manufacturer's recommendations or engineering analysis for each intended end use of the treated landfill gas.
- (C) Documentation of the monitoring methods and ranges, along with justification for their use.
- (D) Identify who is responsible (by job title) for data collection.
- (E) Processes and methods used to collect the necessary data.
- (F) Description of the procedures and methods that are used for quality assurance, maintenance, and repair of all continuous monitoring systems.

(c) Except as provided in §62.16724(d)(2), each owner or operator of a controlled landfill subject to the provisions of this subpart must keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in §62.16722 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.

(1) The following constitute exceedances that must be recorded and reported under §62.16724:

- (i) For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average temperature was more than 28 degrees Celsius (82 degrees Fahrenheit) below the average combustion temperature during the most recent performance test at which compliance with §62.16714(c) was determined.

- (ii) For boilers or process heaters, whenever there is a change in the location at which the vent stream is introduced into the flame zone as required under paragraph (b)(3) of this section.
  - (2) Each owner or operator subject to the provisions of this subpart must keep up-to-date, readily accessible continuous records of the indication of flow to the control system and the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under §62.16722.
  - (3) Each owner or operator subject to the provisions of this subpart who uses a boiler or process heater with a design heat input capacity of 44 megawatts or greater to comply with §62.16714(c) must keep an up-to-date, readily accessible record of all periods of operation of the boiler or process heater. (Examples of such records could include records of steam use, fuel use, or monitoring data collected pursuant to other state, local, tribal, or federal regulatory requirements.
  - (4) Each owner or operator seeking to comply with the provisions of this subpart by use of a non-enclosed flare must keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under §62.16722(c), and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.
  - (5) Each owner or operator of a landfill seeking to comply with §62.16714(e) using an active collection system designed in accordance with §62.16714(b) must keep records of periods when the collection system or control device is not operating.
- (d) Except as provided in §60.38f(d)(2), each owner or operator subject to the provisions of this subpart must keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

unique identification location label on each collector that matches the labeling on the plot map.

- (1) Each owner or operator subject to the provisions of this subpart must keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified under §62.16720(b).
- (2) Each owner or operator subject to the provisions of this subpart must keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in §62.16728(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in §62.16728(a)(3)(ii).
- (e) Except as provided in § 62.16724(d)(2), each owner or operator subject to the provisions of this subpart must keep for at least 5 years up-to-date, readily accessible records of the items in paragraphs (e)(1) through (5) of this section. Each owner or operator that chooses to comply with the provisions in §§ 63.1958, 63.1960, and 63.1961 of this chapter, as allowed in §§ 62.16716, 62.16720, and 62.16722, must keep the records in paragraph (e)(6) of this section and must keep records according to § 63.1983(e)(1) through (5) of this chapter in lieu of paragraphs (e)(1) through (5) of this section.
  - (1) All collection and control system exceedances of the operational standards in § 62.16716, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.
  - (2) Each owner or operator subject to the provisions of this subpart must also keep records of each wellhead temperature monitoring value of 55 degrees Celsius (131 degrees Fahrenheit) or above, each wellhead nitrogen level at or above 20 percent, and each wellhead oxygen level at or above 5 percent.
  - (3) For any root cause analysis for which corrective actions are required in § 62.16720(a)(3) or § 62.16720(a)(4), keep a record of the root cause analysis conducted, including a description of the recommended corrective action(s) taken, and the date(s) the corrective action(s) were completed.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

- (4) For any root cause analysis for which corrective actions are required in § 62.16720(a)(3)(ii) or § 62.16720(a)(4)(ii), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.
- (5) For any root cause analysis for which corrective actions are required in § 62.16720(a)(3)(iii) or § 62.16720(a)(4)(iii), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates, and a copy of any comments or final approval on the corrective action analysis or schedule from the regulatory agency.
- (6) Each owner or operator that chooses to comply with the provisions in §§ 63.1958, 63.1960, and 63.1961 of this chapter, as allowed in §§ 62.16716, 62.16720, and 62.16722, must keep records of the date upon which the owner or operator started complying with the provisions in §§ 63.1958, 63.1960, and 63.1961 of this chapter.
- (f) Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of "design capacity," must keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.
- (g) Landfill owners or operators seeking to demonstrate that site-specific surface methane emissions are below 500 parts-per-million by conducting SEM under the Tier 4 procedures specified in § 62.16718(a)(6) must keep for at least 5 years up-to-date, readily accessible records of all SEM and information related to monitoring instrument calibrations conducted according to sections 8 and 10 of

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

EPA Method 21 of appendix A-7 of 40 CFR part 60 of this chapter, including all of the following items:

- (1) Calibration records:
  - (i) Date of calibration and initials of operator performing the calibration.
  - (ii) Calibration gas cylinder identification, certification date, and certified concentration.
  - (iii) Instrument scale(s) used.
  - (iv) A description of any corrective action taken if the meter readout could not be adjusted to correspond to the calibration gas value.
  - (v) If an owner or operator makes their own calibration gas, a description of the procedure used.
- (2) Digital photographs of the instrument setup. The photographs must be time and date-stamped and taken at the first sampling location prior to sampling and at the last sampling location after sampling at the end of each sampling day, for the duration of the Tier 4 monitoring demonstration.
- (3) Timestamp of each surface scan reading:
  - (i) Timestamp should be detailed to the nearest second, based on when the sample collection begins.
  - (ii) A log for the length of time each sample was taken using a stopwatch (e.g., the time the probe was held over the area).
- (4) Location of each surface scan reading. The owner or operator must determine the coordinates using an instrument with an accuracy of at least 4 meters. Coordinates must be in decimal degrees with at least five decimal places.
- (5) Monitored methane concentration (parts per million) of each reading.
- (6) Background methane concentration (parts per million) after

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

	<p>each instrument calibration test.</p> <p>(7) Adjusted methane concentration using most recent calibration (parts per million).</p> <p>(8) For readings taken at each surface penetration, the unique identification location label matching the label specified in paragraph (d) of this section.</p> <p>(9) Records of the operating hours of the gas collection system for each destruction device.</p> <p>(h) Except as provided in §60.38f(d)(2), each owner or operator subject to the provisions of this subpart must keep for at least 5 years up-to-date, readily accessible records of all collection and control system monitoring data for parameters measured in §60.37f(a)(1), (2), and (3).</p> <p>(i) Any records required to be maintained by this subpart that are submitted electronically via the EPA's CDX may be maintained in electronic format.</p> <p>(j) For each owner or operator reporting leachate or other liquids addition under §60.38f(l), keep records of any engineering calculations or company records used to estimate the quantities of leachate or liquids added, the surface areas for which the leachate or liquids were applied, and the estimates of annual waste acceptance or total waste in place in the areas where leachate or liquids were applied." [Reference: 40 CFR §62.16726(a) thru (g)]</p> <p><b>C. <u>Particulate Matter from Materials Handling and Construction</u></b>          The Permittee shall keep results of the semi-annual inspections for a period of five (5) years and shall maintain the written reasonable precautions (BMPs) at the facility. [Reference: COMAR 26.11.03.06C]</p>
<b>1.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Standards for Air Emissions from Municipal Solid Waste Landfills</u></b></p> <p>See Reporting Requirements in Section 1.5.B.</p> <p><b>B. <u>Operational Standards for Collection and Control Systems</u></b></p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

**§62.16724 Reporting guidelines.**

The Permittee must follow the reporting provisions listed in this section, as applicable, "except as provided under 40 CFR 60.24 and §§ 62.16711(g), (h), and 62.16724(d)(2).

(a) Design capacity report. For existing MSW landfills subject to this subpart, the initial design capacity report must be submitted no later than 90 days after the effective date of EPA approval of the state's plan under section 111(d) of the Clean Air Act. The initial design capacity report must contain the following information:

(1) A map or plot of the landfill, providing the size and location of the landfill, and identifying all areas where solid waste may be landfilled according to the permit issued by the state, local, or tribal agency responsible for regulating the landfill.

(2) The maximum design capacity of the landfill. Where the maximum design capacity is specified in the permit issued by the state, local, or tribal agency responsible for regulating the landfill, a copy of the permit specifying the maximum design capacity may be submitted as part of the report. If the maximum design capacity of the landfill is not specified in the permit, the maximum design capacity must be calculated using good engineering practices. The calculations must be provided, along with the relevant parameters as part of the report. The landfill may calculate design capacity in either megagrams or cubic meters for comparison with the exemption values. If the owner or operator chooses to convert the design capacity from volume to mass or from mass to volume to demonstrate its design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, the calculation must include a site-specific density, which must be recalculated annually. Any density conversions must be documented and submitted with the design capacity report. The state, local, or tribal agency or the Administrator may request other reasonable information as may be necessary to verify the maximum design capacity of the landfill.

(b) Amended design capacity report. An amended design capacity report must be submitted providing notification of an increase in the design capacity of the landfill, within 90 days of an increase in the maximum design capacity of the landfill to meet or exceed 2.5 million megagrams and 2.5 million cubic meters. This increase in

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

design capacity may result from an increase in the permitted volume of the landfill or an increase in the density as documented in the annual recalculation required in § 62.16726(f).

- (c) NMOC emission rate report. For existing MSW landfills covered by this subpart with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, the NMOC emission rate report must be submitted following the procedure specified in paragraph (j)(2) of this section no later than 90 days after the effective date of this subpart. The NMOC emission rate report must be submitted to the Administrator annually following the procedure specified in paragraph (j)(2) of this section, except as provided for in paragraph (c)(3) of this section. The Administrator may request such additional information as may be necessary to verify the reported NMOC emission rate.
- (1) The NMOC emission rate report must contain an annual or 5-year estimate of the NMOC emission rate calculated using the formula and procedures provided in § 62.16718(a) or (b), as applicable.
  - (2) The NMOC emission rate report must include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions.
  - (3) If the estimated NMOC emission rate as reported in the annual report to the Administrator is less than 34 megagrams per year in each of the next 5 consecutive years, the owner or operator may elect to submit, following the procedure specified in paragraph (j)(2) of this section, an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report. This estimate must include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based must be provided to the Administrator. This estimate must be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate must be submitted to the Administrator. The revised estimate must cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate.
  - (4) Each owner or operator subject to the requirements of this subpart is exempted from the requirements to submit an NMOC emission rate report, after installing a collection and control

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

system that complies with § 62.16714(b) and (c), during such time as the collection and control system is in operation and in compliance with §§ 62.16716 and 62.16720.

- (d) Collection and control system design plan. The collection and control system design plan must be prepared and approved by a professional engineer and must meet the following requirements:
- (1) The collection and control system as described in the design plan must meet the design requirements in § 62.16714(b) and (c).
  - (2) The collection and control system design plan must include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions of §§ 62.16716 through 62.16726 proposed by the owner or operator.
  - (3) The collection and control system design plan must either conform to specifications for active collection systems in § 62.16728 or include a demonstration to the Administrator's satisfaction of the sufficiency of the alternative provisions to § 62.16728.
  - (4) Each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must submit a copy of the collection and control system design plan cover page that contains the engineer's seal to the Administrator within 1 year of the first NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year, except as follows:
    - (i) If the owner or operator elects to recalculate the NMOC emission rate after Tier 2 NMOC sampling and analysis as provided in § 62.16718(a)(3) and the resulting rate is less than 34 megagrams per year, annual periodic reporting must be resumed, using the Tier 2 determined site-specific NMOC concentration, until the calculated NMOC emission rate is equal to or greater than 34 megagrams per year or the landfill is closed. The revised NMOC emission rate report, with the recalculated NMOC emission rate based on NMOC sampling and analysis, must be submitted, following the procedures in paragraph (j)(2) of this section, within 180 days of the first calculated exceedance of 34 megagrams per year.
    - (ii) If the owner or operator elects to recalculate the NMOC emission rate after determining a site-specific methane

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

generation rate constant  $k$ , as provided in Tier 3 in § 62.16718(a)(4), and the resulting NMOC emission rate is less than 34 megagrams per year, annual periodic reporting must be resumed. The resulting site-specific methane generation rate constant  $k$  must be used in the NMOC emission rate calculation until such time as the emissions rate calculation results in an exceedance. The revised NMOC emission rate report based on the provisions of § 62.16718(a)(4) and the resulting site-specific methane generation rate constant  $k$  must be submitted, following the procedure specified in paragraph (j)(2) of this section, to the Administrator within 1 year of the first calculated NMOC emission rate equaling or exceeding 34 megagrams per year.

- (iii) If the owner or operator elects to demonstrate that site-specific surface methane emissions are below 500 parts-per-million methane, based on the provisions of § 62.16718(a)(6), then the owner or operator must submit annually a Tier 4 surface emissions report as specified in this paragraph following the procedure specified in paragraph (j)(2) of this section until a surface emissions reading of 500 parts-per-million methane or greater is found. If the Tier 4 surface emissions report shows no surface emissions readings of 500 parts-per-million methane or greater for four consecutive quarters at a closed landfill, then the landfill owner or operator may reduce Tier 4 monitoring from a quarterly to an annual frequency. The Administrator may request such additional information as may be necessary to verify the reported instantaneous surface emission readings. The Tier 4 surface emissions report must clearly identify the location, date and time (to the nearest second), average wind speeds including wind gusts, and reading (in parts-per-million) of any value 500 parts-per-million methane or greater, other than non-repeatable, momentary readings. For location, you must determine the latitude and longitude coordinates using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places. The Tier 4 surface emission report should also include the results of the most recent Tier 1 and Tier 2 results in order to verify that the landfill does not exceed 50 megagrams per year of NMOC.

(A) The initial Tier 4 surface emissions report must be

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

submitted annually, starting within 30 days of completing the fourth quarter of Tier 4 SEM that demonstrates that site-specific surface methane emissions are below 500 parts-per-million methane, and following the procedure specified in paragraph (j)(2) of this section.

(B) The Tier 4 surface emissions rate report must be submitted within 1 year of the first measured surface exceedance of 500 parts-per-million methane, following the procedure specified in paragraph (j)(2) of this section.

(iv) If the landfill is in the closed landfill subcategory, the owner or operator is exempt from submitting a collection and control system design plan to the Administrator provided that conditions in § 62.16711(g)(3) are met. If not, the owner or operator shall follow the submission procedures and timing in § 62.16724(d)(ii) and (iii) using a level of 50 Mg/yr instead of 34 Mg/yr.

(5) The landfill owner or operator must notify the Administrator that the design plan is completed and submit a copy of the plan's signature page. The Administrator has 90 days to decide whether the design plan should be submitted for review. If the Administrator chooses to review the plan, the approval process continues as described in paragraph (c)(6) of this section. However, if the Administrator indicates that submission is not required or does not respond within 90 days, the landfill owner or operator can continue to implement the plan with the recognition that the owner or operator is proceeding at their own risk. In the event that the design plan is required to be modified to obtain approval, the owner or operator must take any steps necessary to conform any prior actions to the approved design plan and any failure to do so could result in an enforcement action.

(6) Upon receipt of an initial or revised design plan, the Administrator must review the information submitted under paragraphs (d)(1) through (3) of this section and either approve it, disapprove it, or request that additional information be submitted. Because of the many site-specific factors involved with landfill gas system design, alternative systems may be necessary. A wide variety of system designs are possible, such as vertical wells, combination horizontal and vertical collection systems, or horizontal trenches only, leachate collection

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

components, and passive systems. If the Administrator does not approve or disapprove the design plan, or does not request that additional information be submitted within 90 days of receipt, then the owner or operator may continue with implementation of the design plan, recognizing they would be proceeding at their own risk.

- (7) If the owner or operator chooses to demonstrate compliance with the emission control requirements of this subpart using a treatment system as defined in this subpart, then the owner or operator must prepare a site-specific treatment system monitoring plan as specified in § 62.16726(b)(5). Legacy controlled landfills must prepare the monitoring plan no later than May 23, 2022.
- (e) Revised design plan. The owner or operator who has already been required to submit a design plan under paragraph (d) of this section, or under subpart GGG of this part; 40 CFR part 60, subpart WWW; or a state plan implementing subpart Cc of 40 CFR part 60, must submit a revised design plan to the Administrator for approval as follows:
- (1) At least 90 days before expanding operations to an area not covered by the previously approved design plan.
- (2) Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (d) of this section.
- (f) Closure report. Each owner or operator of a controlled landfill must submit a closure report to the Administrator within 30 days of ceasing waste acceptance. The Administrator may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the Administrator, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 60.7(a)(4).
- (g) Equipment removal report. Each owner or operator of a controlled landfill must submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

- (1) The equipment removal report must contain the following items:
- (i) A copy of the closure report submitted in accordance with paragraph (f) of this section;
  - (ii) and A copy of the initial performance test report demonstrating that the 15-year minimum control period has expired, unless the report of the results of the performance test has been submitted to the EPA via the EPA's Central Data Exchange (CDX), or information that demonstrates that the gas collection and control system will be unable to operate for 15 years due to declining gas flows. In the equipment removal report, the process unit(s) tested, the pollutant(s) tested, and the date that such performance test was conducted may be submitted in lieu of the performance test report if the report has been previously submitted to the EPA's CDX; and
  - (iii) Dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 34 megagrams or greater of NMOC per year, unless the NMOC emission rate reports have been submitted to the EPA via the EPA's CDX. If the NMOC emission rate reports have been previously submitted to the EPA's CDX, a statement that the NMOC emission rate reports have been submitted electronically and the dates that the reports were submitted to the EPA's CDX may be submitted in the equipment removal report in lieu of the NMOC emission rate reports; or
  - (iv) For the closed landfill subcategory, dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year, unless the NMOC emission rate reports have been submitted to the EPA via the EPA's CDX. If the NMOC emission rate reports have been previously submitted to the EPA's CDX, a statement that the NMOC emission rate reports have been submitted electronically and the dates that the reports were submitted to the EPA's CDX may be submitted in the equipment removal report in lieu of the NMOC emission rate reports.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

(2) The Administrator may request such additional information as may be necessary to verify that all of the conditions for removal in § 62.16714(f) have been met.

(h) Annual report. The owner or operator of a landfill seeking to comply with § 62.16714(e)(2) using an active collection system designed in accordance with § 62.16714(b) must submit to the Administrator, following the procedures specified in paragraph (j)(2) of this section, an annual report of the recorded information in paragraphs (h)(1) through (7) of this section. The initial annual report must be submitted within 180 days of installation and startup of the collection and control system except for legacy controlled landfills that have already submitted an initial report under 40 CFR part 60, subpart WWW; subpart GGG of this part; or a state plan implementing 40 CFR Part 60, Subpart Cc. Except for legacy controlled landfills, the initial annual report must include the initial performance test report required under 40 CFR 60.8, as applicable, unless the report of the results of the performance test has been submitted to the EPA via the EPA's CDX. Legacy controlled landfills are exempted from submitting performance test reports in EPA's CDX provided that those reports were submitted under 40 CFR part 60, subpart WWW; subpart GGG of this part; or a state plan implementing 40 CFR part 60, subpart Cc. In the initial annual report, the process unit(s) tested, the pollutant(s) tested and the date that such performance test was conducted may be submitted in lieu of the performance test report if the report has been previously submitted to the EPA's CDX. The initial performance test report must be submitted, following the procedure specified in paragraph (j)(1) of this section, no later than the date that the initial annual report is submitted. For enclosed combustion devices and flares, reportable exceedances are defined under § 62.16726(c)(1). Legacy controlled landfills are required to submit the annual report no later than one year after the most recent annual report submitted. If complying with the operational provisions of §§ 63.1958, 63.1960, and 63.1961 of this chapter, as allowed at §§ 62.16716, 62.16720, and 62.16722, the owner or operator must follow the semi-annual reporting requirements in § 63.1981(h) of this chapter in lieu of this paragraph.

(1) Value and length of time for exceedance of applicable parameters monitored under § 62.16722(a)(1), (b), (c), (d), and (g).

(2) Description and duration of all periods when the gas stream was

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

diverted from the control device or treatment system through a bypass line or the indication of bypass flow as specified under § 62.16722.

(3) Description and duration of all periods when the control device or treatment system was not operating and length of time the control device or treatment system was not operating.

(4) All periods when the collection system was not operating.

(5) The location of each exceedance of the 500 parts-per-million methane concentration as provided in § 62.16716(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month. For location, you must determine the latitude and longitude coordinates using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places.

(6) The date of installation and the location of each well or collection system expansion added pursuant to § 62.16720(a)(3), (4), (b), and (c)(4).

(7) For any corrective action analysis for which corrective actions are required in § 62.16720(a)(3) or (4) and that take more than 60 days to correct the exceedance, the root cause analysis conducted, including a description of the recommended corrective action(s), the date for corrective action(s) already completed following the positive pressure or elevated temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.

(i) Initial performance test report. Each owner or operator seeking to comply with § 62.16714(c) must include the following information with the initial performance test report required under 40 CFR 60.8 of this chapter:

(1) A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion;

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

- (2) The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;
  - (3) The documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material;
  - (4) The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;
  - (5) The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
  - (6) The provisions for the control of off-site migration.
- (j) Electronic reporting. The owner or operator must submit reports electronically according to paragraphs (j)(1) and (2) of this section.
- (1) Within 60 days after the date of completing each performance test (as defined in 40 CFR 60.8 of this chapter), the owner or operator must submit the results of each performance test according to the following procedures:
- (i) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website ([https://www3.epa.gov/ttn/chief/ert/ert\\_info.html](https://www3.epa.gov/ttn/chief/ert/ert_info.html)) at the time of the test, you must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website, once the XML schema is available. If you claim that some of the performance test information

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

being submitted is confidential business information (CBI), you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(ii) For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test, you must submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 60.4 of this chapter.

(2) Each owner or operator required to submit reports following the procedure specified in this paragraph must submit reports to the EPA via the CEDRI (CEDRI can be accessed through the EPA's CDX). The owner or operator must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www3.epa.gov/ttn/chief/cedri/index.html>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the owner or operator must submit the report to the Administrator at the appropriate address listed in 40 CFR 60.4 of this chapter. Once the form has been available in CEDRI for 90 calendar days, the owner or operator must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

(k) Corrective action and the corresponding timeline. The owner or operator must submit according to paragraphs (k)(1) and (2) of this section. If complying with the operational provisions of 40 CFR 63.1958, 63.1960, and 63.1961 of this chapter, as allowed at §§ 62.16716, 62.16720, and 62.16722, the owner or operator must follow the corrective action and the corresponding timeline reporting requirements in § 63.1981(j) of this chapter in lieu of paragraphs

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

(k)(1) and (2) of this section.

(1) For corrective action that is required according to § 62.16720(a)(3)(iii) or 62.16720(a)(4)(iii) and is expected to take longer than 120 days after the initial exceedance to complete, you must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator as soon as practicable but no later than 75 days after the first measurement of positive pressure or temperature monitoring value of 55 degrees Celsius (131 degrees Fahrenheit) or above. The Administrator must approve the plan for corrective action and the corresponding timeline.

(2) For corrective action that is required according to § 62.16720(a)(3)(iii) or § 62.16720(a)(4)(iii) and is not completed within 60 days after the initial exceedance, you must submit a notification to the Administrator as soon as practicable but no later than 75 days after the first measurement of positive pressure or temperature exceedance.

(l) Liquids addition. The owner or operator of a designated facility with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters that has employed leachate recirculation or added liquids based on a Research, Development, and Demonstration permit (issued through Resource Conservation and Recovery Act (RCRA), subtitle D, part 258) within the last 10 years must submit to the Administrator, annually, following the procedure specified in paragraph (j)(2) of this section, the following information:

(1) Volume of leachate recirculated (gallons per year) and the reported basis of those estimates (records or engineering estimates).

(2) Total volume of all other liquids added (gallons per year) and the reported basis of those estimates (records or engineering estimates).

(3) Surface area (acres) over which the leachate is recirculated (or otherwise applied).

(4) Surface area (acres) over which any other liquids are applied.

(5) The total waste disposed (megagrams) in the areas with

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

recirculated leachate and/or added liquids based on on-site records to the extent data are available, or engineering estimates and the reported basis of those estimates.

- (6) The annual waste acceptance rates (megagrams per year) in the areas with recirculated leachate and/or added liquids, based on on-site records to the extent data are available, or engineering estimates.
- (7) The initial report must contain items in paragraph (l)(1) through (6) of this section per year for the most recent 365 days as well as for each of the previous 10 years, to the extent historical data are available in on-site records, and the report must be submitted no later than June 21, 2022.
- (8) Subsequent annual reports must contain items in paragraph (l)(1) through (6) of this section for the 365-day period following the 365-day period included in the previous annual report, and the report must be submitted no later than 365 days after the date the previous report was submitted.
- (9) Landfills in the closed landfill subcategory are exempt from reporting requirements contained in paragraphs (l)(1) through (7) of this section.
- (10) Landfills may cease annual reporting of items in paragraphs (l)(1) through (6) of this section once they have submitted the closure report in § 62.16724(f).
- (m) Tier 4 notification.
  - (1) The owner or operator of a designated facility with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must provide a notification of the date(s) upon which it intends to demonstrate site-specific surface methane emissions are below 500 parts-per-million methane, based on the Tier 4 provisions of § 62.16718(a)(6). The landfill must also include a description of the wind barrier to be used during the SEM in the notification. Notification must be postmarked not less than 30 days prior to such date.
  - (2) If there is a delay to the scheduled Tier 4 SEM date due to weather conditions, including not meeting the wind requirements

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1**

in § 62.16718(a)(6)(A), the owner or operator of a landfill shall notify the Administrator by email or telephone no later than 48 hours before any known delay in the original test date, and arrange an updated date with the Administrator by mutual agreement.

(n) Notification of meeting Tier 4. The owner or operator of a designated facility must submit a notification to the EPA Regional office within 10 business days of completing each increment of progress. Each notification must indicate which increment of progress specified in § 62.16712 has been achieved. The notification must be signed by the owner or operator of the landfill.

(1) For the first increment of progress (submit control plan), you must follow paragraph (p) of this section in addition to submitting the notification described in paragraph (n) of this section. A copy of the design plan must also be kept on site at the landfill.

(2) For the second increment of progress, a signed copy of the contract(s) awarded must be submitted in addition to the notification described in paragraph (n) of this section.

(o) Notification of failing to meet an increment of progress.

The owner or operator of a designated facility who fails to meet any increment of progress specified in § 62.16712(a)(1) through (5) according to the applicable schedule in § 62.16712 must submit notification that the owner or operator failed to meet the increment to the EPA Regional office within 10 business days of the applicable date in § 62.16712.

(p) Alternate dates for increments 2 and 3.

The owner or operator (or the state or tribal air pollution control authority) that is submitting alternative dates for increments 2 and 3 according to § 62.16712(d) must do so by the date specified for submitting the final control plan. The date for submitting the final control plan is specified in § 62.16712(c), as applicable. The owner or operator (or the state or tribal air pollution control authority) must submit a justification if any of the alternative dates are later than the increment dates in table 1 of this subpart. In addition to submitting the alternative dates to the appropriate EPA Regional office, the owner or operator must also submit the alternative dates to the state

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 1</b>	
	<p>or tribe.</p> <p>(q) <u>24-hour high temperature report.</u></p> <p>Each owner or operator that chooses to comply with the provisions in §§ 63.1958, 63.1960, and 63.1961 of this chapter, as allowed in §§ 62.16716, 62.16720, and 62.16722, must submit the 24-hour high temperature report according to § 63.1981(k) of this chapter.  <b>[Reference: 40CFR §62.16724 (a) thru (q)]</b></p> <p><b><u>C. Particulate Matter from Materials Handling and Construction</u></b></p> <p>See Reporting Section 1.4.C.</p>

<b>Table IV – 1a</b>	
<b>1a.0</b>	<p><b><u>Emissions Unit Number(s): A&amp;B (Cont'd)</u></b></p> <p><b><u>Area A</u></b>          148-acre area of landfill is closed and capped. Area A was active from 1968 to 1992 and contains approximately 7.5 million tons of waste. It incorporates a LFG collection system. LFG from Area A is collected, sent to compressor building for treatment (compression, dehydration, and filtrations, and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.</p> <p><b><u>Area B</u></b>          140-acre area of landfill, which contains eleven planned cells. Landfilling in Area B began in 1992 and is presently ongoing. Waste has been placed in nine cells. The design capacity of the landfill is 8.5 million tons. Area B incorporates a LFG collection system. LFG from Area B is collected, sent to compressor building for treatment (compression, dehydration and filtration), and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.</p>
<b>1a.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p>Subpart AAAA – National Emission Standard for Hazardous Air Pollutants: Municipal Solid Waste Landfills.</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1a**

Applicability

“You are subject to this subpart if you own or operate an MSW landfill that has accepted waste since November 8, 1987, or has additional capacity for waste deposition and meets any one of the three criteria in paragraphs (a)(1) through (3) of this section: (3) Your MSW landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m<sup>3</sup>) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to § 63.1959.” **[Reference: 40.CFR §63.1935(a)(3)]**

“If your landfill is an existing affected source, you must comply with this subpart by January 16, 2004.” **[Reference: 40 CFR §63.1945(b)]**

Standards

“(a) Before September 28, 2021, if alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions have already been approved under 40 CFR part 60, subpart WWW; subpart XXX; a federal plan; or an EPA-approved and effective state or tribal plan, these alternatives can be used to comply with this subpart, except that all affected sources must comply with the SSM requirements in subpart A of this part as specified in Table 1 of this subpart and all affected sources must submit compliance reports every 6 months as specified in § 63.1981(h), including information on all deviations that occurred during the 6-month reporting period. Deviations for continuous emission monitors or numerical continuous parameter monitors must be determined using a 3-hour monitoring block average. Beginning no later than September 28, 2021, the collection and control system design plan may include for approval collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions, as provided in § 63.1981(d)(2).” **[Reference: 40 CFR §63.1955(a)]**

General and Continuing Compliance Requirements

“(a) Except as provided in § 63.1981(d)(2), the specified methods in paragraphs (a)(1) through (5) of this section must be used to determine whether the gas collection system is in compliance with § 63.1959(b)(2)(ii).

(1) For the purposes of calculating the maximum expected gas generation

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1a**

flow rate from the landfill to determine compliance with § 63.1959(b)(2)(ii)(C)(1), either Equation 5 or Equation 6 must be used. The owner or operator may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Administrator. The methane generation rate constant (k) and methane generation potential (Lo) kinetic factors should be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42) or other site-specific values demonstrated to be appropriate and approved by the Administrator. If k has been determined as specified in § 63.1959(a)(4), the value of k determined from the test must be used. A value of no more than 15 years must be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure.”

“(iii) If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, Equation 5 or Equation 6 in paragraphs (a)(1)(i) and (ii) of this section. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using Equation 5 or Equation 6 in paragraph (a)(1)(i) or (ii) of this section or other methods must be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment.”

(2) “For the purposes of determining sufficient density of gas collectors for compliance with § 63.1959(b)(2)(ii)(B)(2), the owner or operator must design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Administrator, capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.”

(3) “For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with § 63.1959(b)(2)(ii)(B)(3), the owner or operator must measure gauge pressure in the gas collection header applied to each individual well monthly. Any attempted corrective measure must not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval. If a positive pressure exists, follow the procedures as specified in § 60.755(a)(3), except:

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1a**

(i) Beginning no later than September 27, 2021, if a positive pressure exists, action must be initiated to correct the exceedance within 5 days, except for the three conditions allowed under § 63.1958(b).

(A) If negative pressure cannot be achieved without excess air infiltration within 15 days of the first measurement of positive pressure, the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after positive pressure was first measured. The owner or operator must keep records according to § 63.1983(e)(3).

(B) If corrective actions cannot be fully implemented within 60 days following the positive pressure measurement for which the root cause analysis was required, the owner or operator must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the positive pressure measurement. The owner or operator must submit the items listed in § 63.1981(h)(7) as part of the next semi-annual report. The owner or operator must keep records according to § 63.1983(e)(4).

(C) If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 63.1981(j). The owner or operator must keep records according to § 63.1983(e)(5).”

(ii) [Reserved]

(4) “Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with the temperature and nitrogen or oxygen operational standards in introductory paragraph § 63.1958(c), for the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator must follow the procedures as specified in § 60.755(a)(5) of this chapter, except:

(i) Once an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with the operational standard for temperature in § 63.1958(c)(1), the owner or operator must monitor each well monthly for temperature for the purpose of identifying whether excess air infiltration exists. If a well exceeds the operating parameter for temperature as provided in § 63.1958(c)(1), action must

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 1a**

be initiated to correct the exceedance within 5 days. Any attempted corrective measure must not cause exceedances of other operational or performance standards.

(A) If a landfill gas temperature less than or equal to 62.8 degrees Celsius (145 degrees Fahrenheit) cannot be achieved within 15 days of the first measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit), the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after a landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit) was first measured. The owner or operator must keep records according to § 63.1983(e)(3).

(B) If corrective actions cannot be fully implemented within 60 days following the temperature measurement for which the root cause analysis was required, the owner or operator must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit). The owner or operator must submit the items listed in § 63.1981(h)(7) as part of the next semi-annual report. The owner or operator must keep records according to § 63.1983(e)(4).

(C) If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 63.1981(h)(7) and (j). The owner or operator must keep records according to § 63.1983(e)(5).

(D) If a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured, according to the procedures in § 63.1961(a)(5)(vi) is greater than or equal to 1,000 ppmv the corrective action(s) for the wellhead temperature standard (62.8 degrees Celsius or 145 degrees Fahrenheit) must be completed within 15 days.”

(5) “An owner or operator seeking to demonstrate compliance with § 63.1959(b)(2)(ii)(B)(4) through the use of a collection system not conforming to the specifications provided in § 63.1962 must provide

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 1a</b>	
	<p>information satisfactory to the Administrator as specified in § 63.1981(d)(3) demonstrating that off-site migration is being controlled.</p> <p>(b) For purposes of compliance with § 63.1958(a), each owner or operator of a controlled landfill must place each well or design component as specified in the approved design plan as provided in § 63.1981(d). Each well must be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of:</p> <p>(1) 5 years or more if active; or</p> <p>(2) 2 years or more if closed or at final grade.</p> <p>(c) The following procedures must be used for compliance with the surface methane operational standard as provided in § 63.1958(d).” <b>[Reference: 40 CFR §63.1960]</b></p>
<b>1a.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p>See <u>General and Continuing Compliance Requirements</u></p>
<b>1a.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p>See <u>General and Continuing Compliance Requirements</u></p>
<b>1a.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p>“You must submit the reports specified in this section and the reports specified in Table 1 to this subpart. If you have previously submitted a design capacity report, amended design capacity report, initial NMOC emission rate report, initial or revised collection and control system design plan, closure report, equipment removal report, or initial performance test under 40 CFR part 60, subpart WWW; 40 CFR part 60, subpart XXX; or a federal plan or EPA-approved and effective state plan or tribal plan that implements either 40 CFR part 60, subpart Cc or 40 CFR part 60, subpart Cf, then that submission constitutes compliance with the design capacity report in paragraph (a) of this section, the amended design capacity report in paragraph (b) of this section, the initial NMOC emission rate report in paragraph (c) of this section, the initial collection and control system design plan in paragraph (d) of this section, the revised design plan in paragraph (e) of this section, the closure report in paragraph (f) of this section, the equipment removal report in paragraph (g) of this section, and the initial performance test report in paragraph (i) of this section. You</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 1a</b>	
	<p>do not need to re-submit the report(s). However, you must include a statement certifying prior submission of the respective report(s) and the date of submittal in the first semi-annual report required in this section.” <b>[Reference: 40 CFR §63.1981]</b></p> <p>“(b) Except as provided in § 63.1981(d)(2), each owner or operator of a controlled landfill must keep up-to-date, readily accessible records for the life of the control system equipment of the data listed in paragraphs (b)(1) through (5) of this section as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years. Records of the control device vendor specifications must be maintained until removal.” <b>[Reference: 40.CFR §63.1983(b)]</b></p>
<b>1a.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p>See Record Keeping Requirements.</p>

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 2</b>	
<b>2.0</b>	<p><b><u>Emissions Unit Number(s): F1, F2 &amp; F3 (Flaring Station)</u></b></p> <p><b>MDE Reg. No. (9-0821) for F1 and F2</b>            One flare station composed of two (2) enclosed ground flares each rated at 45 million Btu per hour used to burn off excess LFG, both installed in October 1995.</p> <p><b>MDE Reg. No. (9-1361) for F3</b>            One (1) enclosed flare rated at 90 million Btu per hour used to burn off excess LFG, installed in October 2014.</p>
<b>2.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>  <b><u>COMAR 26.11.06.02C(2) – Visible Emission Standards.</u></b>            “In Areas III and IV, a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”  <b><u>COMAR 26.11.06.02A(2) – Exception.</u></b>            “The visible emissions standards in C of this regulation do not apply to emissions during start-up and process modification or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period.”</p> <p><b>B. <u>Air Standards</u></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 or less. The reduction efficiency or concentration in parts-per-million by volume must 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 § 62.16718(d). The performance test is not required for boilers and process heaters with design heat input capacities equal to or greater than 44 megawatts that burn landfill gas for compliance with this subpart.” <b>[Reference: 40 CFR §62.16714(c)(2)]</b></p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 2**

	<p>“The control device must be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in § 62.16722.” <b>[Reference: 40 CFR §62.16714(c)(2)(ii)]</b></p> <p><b>C. <u>Operational Standard</u></b> <b><u>For F1 &amp; F2</u></b> The temperature of the flue gas leaving the combustion chamber shall be at least 1400 °F. The Permittee shall analyze the composition of the landfill gas during each stack emission test. <b>[Reference: MDE PTC No. 16-9-0821 N]</b></p> <p><b>[Note: The Permittee must operate the flares at a temperature no less than 82°F from the temperature achieved during the most recent stack test.]</b></p> <p><b><u>For F3</u></b> The Permittee shall operate the enclosed flare system with the following:</p> <ul style="list-style-type: none"> <li>(a) A temperature (heat sensing) monitoring device, such as an ultraviolet beam sensor or thermocouple, equipped with a continuous recorder and having an accuracy of ±1percent of the temperature being measured expressed in degrees Celsius or ±0.5°C, whichever is greater.</li> <li>(b) A gas flow rate measuring device that provides a measurement of gas flow to the flare system. The system shall either: (i) Install, calibrate and maintain a gas flow rate measuring device that shall record the flow rate to the control device at least 15 minutes; or (ii) Secure the bypass line valve in the close position with a car-seal or a lock and key type configuration.</li> </ul> <p><b>[Reference: MDE PTC No. 033-2084-9-1361, Part D- Operating Condition D(4)]</b></p> <p><b>[Note: The Permittee must operate the flare at a temperature no less than 82°F from the temperature achieved during the most recent stack test.]</b></p>
2.2	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> See Monitoring Requirements.</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 2**

**B. Air Standards**

“For the performance test required in § 62.16714(c)(2), EPA Method 25 or 25C (EPA Method 25C may be used at the inlet only) of appendix A-7 of 40 CFR part 60 must be used to determine compliance with the 98 weight-percent efficiency or the 20 parts-per-million by volume outlet NMOC concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by § 62.16724(d)(2). EPA Method 3, 3A, or 3C of appendix A-2 of 40 CFR part 60 must be used to determine oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 parts-per-million NMOC as carbon (8 parts-per-million NMOC as hexane), EPA Method 25A should be used in place of EPA Method 25. EPA Method 18 of appendix A-6 of 40 CFR part 60 may be used in conjunction with EPA Method 25A on a limited basis (compound specific, e.g., methane) or EPA Method 3C may be used to determine methane. The methane as carbon should be subtracted from the EPA Method 25A total hydrocarbon value as carbon to give NMOC concentration as carbon. The landfill owner or operator must divide the NMOC concentration as carbon by 6 to convert the C as carbon to C as hexane. Equation 4 must be used to calculate efficiency:

$$\text{Control Efficiency} = (\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / (\text{NMOC}_{\text{in}})$$

where,

NMOC<sub>in</sub> = mass of NMOC entering control device

NMOC<sub>out</sub> = mass of NMOC exiting control device”

**[Reference: 40 CFR §62.16718(e)]**

**C. Operational Standard**

For F1 & F2

See Monitoring Requirement.

For F3

The Permittee shall perform an initial performance test or compliance determination to determine the operational destruction efficiency or outlet concentration specified: 98 percent NMOC destruction efficiency or reduce the outlet to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen, while the gases are burned through the system. **[Reference: MDE PTC No. 033-2084-9-1361, Condition D(3) & E(1)]**

**2.3 Monitoring Requirements:**

**A. Control of Visible Emissions**

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 2**

	<p>The Permittee shall properly operate and maintain the flare in a manner to minimize visible emissions. <b>[Reference: COMAR 26.11.03.06C]</b></p> <p><b><u>B. Air Standards</u></b></p> <p>“Each owner or operator seeking to comply with § 62.16714(c) using an enclosed combustor must calibrate, maintain, and operate according to the manufacturer’s specifications, the following equipment:</p> <p>(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius or ±0.5 degrees Celsius, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity equal to or greater than 44 megawatts.</p> <p>(2) A device that records flow to the control device and bypass of the control device (if applicable). The owner or operator must:</p> <p>(i) Install, calibrate, and maintain a gas flow rate measuring device that must record the flow to the control device at least every 15 minutes; and</p> <p>(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.” <b>[Reference: 40 CFR §62.16722(b)]</b></p> <p><b><u>C. Operational Standard</u></b></p> <p><u>For F1 &amp; F2</u></p> <p>The Permittee shall continuously monitor and record the temperature of the flue gas leaving the combustion chamber. <b>[Reference: COMAR 26.11.03.06C]</b></p> <p><u>For F3</u></p> <p>A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the close position and that the gas flow is not diverted through the bypass line. <b>[Reference: MDE PTC No. 033-2084-9-1361, Part D-Operating Condition D(4)]</b></p>
2.4	<p><b><u>Record Keeping Requirements:</u></b></p> <p><b><u>NOTE:</u></b> All records must be maintained for a period of 5 years. <b>[Reference: COMAR 26.11.03.06.C (5)(g)]</b></p> <p><b><u>A. Control of Visible Emissions</u></b></p> <p>The Permittee shall retain records of preventive maintenance on site for</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 2**

at least five years and make these records available to the Department upon request. **[Reference: C OMAR 26.11.03.06C]**

**B. Air Standards**

“Except as provided in § 62.16724(d)(2), each owner or operator of a controlled landfill must keep up-to-date, readily accessible records for the life of the control system equipment of the data listed in paragraphs (b)(1) through (5) of this section as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years. Records of the control device vendor specifications must be maintained until removal.” **[Reference: 40 CFR §62.16726(b)]**

**C. Operational Standard**

For F1 & F2

The Permittee shall maintain all temperature monitoring data on site for at least five years and shall make them available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

For F3

The Permittee shall keep up-to-date and readily accessible records for the life of the control equipment the following data: (1) the flare burning temperature with accuracy of  $\pm 1$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 0.5^{\circ}\text{C}$ , whichever is greater; (2) a gas flow rate to or bypass of the flare system.

**[Reference: MDE PTC No. 033-2084-9-1361, Part E-Testing, Monitoring, Record Keeping and Reporting Condition 2]**

The Permittee shall keep records of the monthly visual inspection performed on the seal or closure mechanism to ensure that the valve is maintained in the closed position and the gas flow is not diverted through the bypass line. **[Reference: COMAR 26.11.03.06C]**

**2.5 Reporting Requirements:**

**A. Control of Visible Emissions**

The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, “Report of Excess Emissions and Deviations.”

**B. Air Standards**

The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, “Report of Excess Emissions and Deviations.”

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 2**

	<p><b>C. <u>Operational Standard</u></b></p> <p><u>For F1 &amp; F2</u> The Permittee shall submit to the Department the results of the stack emissions tests. These tests shall include a landfill gas analysis and landfill gas flow rate measurements. The Permittee shall maintain all stack tests results on site for at least five years and shall make them available to the Department upon request. <b>[Reference: MDE PTC No. 16-9-0821 N]</b></p> <p><u>For F3</u> The Permittee shall report the following to the Department: (1) the average combustion temperature measured at least every 15 minutes and averaged over the same time period of the performance test; (2) the percent reduction of NMOC determined as specified in 40 CFR 60.754(d) achieved by the control device. <b>[Reference: MDE PTC No. 033-2084-9-1361, Part E-Testing, Monitoring, Record Keeping and Reporting Condition 1]</b></p> <p>The Permittee shall report any instances during which the parameter boundaries established during the most recent performance test are exceeded. The following constitute exceedances that shall be recorded and reported to the Department: For the enclosed flare, all 3-hour periods of operation during which the average combustion temperature was more that 28 °C below the average temperature the most recent performance test at which compliance with the limitation set was determined.</p> <p>The Permittee shall report instances or all periods of operation in which the flame or flare pilot flame serving the enclosed flare was absent. <b>[Reference: MDE PTC No. 033-2084-9-1361, Part E-Testing, Monitoring, Record Keeping and Reporting Condition 4]</b></p>
--	--

**Table IV – 3**

	<p style="text-align: center;"><b>Table IV – 3</b></p>
<b>3.0</b>	<p><b><u>Emissions Unit Number(s): B1 &amp; B2 (Boilers)</u></b></p> <p><b>MDE Reg. No. 4-1621 &amp; 4-1622</b> Two (2) Weil McLain No. 2 fuel oil fired boilers each rated at 2.049 million Btu per hour heat input, with biogas from the LPP serving as the secondary fuel. These boilers are located on-site at the leachate pre-treatment plant and are used for pre-heating leachate and for heating building space.</p>
<b>3.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3**

**A. Control of Visible Emissions**

**COMAR 26.11.09.05A(2) – Fuel Burning Equipment.**

“(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.

(3) Exceptions. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”

**B. Control of Sulfur Oxides**

**COMAR 26.11.09.07A(2) – Sulfur Content Limitations for Fuel.**

“A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV: (b) Distillate fuel oils, 0.3 percent.”

**C. Control of Nitrogen Oxides**

**COMAR 26.11.09.08B(5) – Operator Training.**

- (a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”

**COMAR 26.11.09.08F – Requirements for Space Heaters.**

- “(1) A person who owns or operates a space heater as defined in Regulation .01B of this chapter shall:
- (h) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation;
  - (i) Develop an operating and maintenance plan to minimize NOx emissions based on the recommendations of equipment vendors and other information including the source's operating and maintenance experience;
  - (j) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;
  - (k) Require installation operators to attend in-State operator training

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3**

	<p>programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and</p> <ul style="list-style-type: none"> <li>(1) Prepare and maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request.</li> <li>(2) A person who owns or operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date when the fuel-burning equipment did not qualify, and shall meet the applicable fuel-burning equipment RACT requirement in this regulation.”</li> </ul> <p><b>D. <u>Operational Standard</u></b>          The Permittee shall only burn No. 2 fuel oil, or biogas, unless the Permittee applies for and receives an approval or permit from the Department to burn an alternate fuel. <b>[Reference: COMAR 26.11.02.09A]</b></p>
<p><b>3.2</b></p>	<p><b><u>Testing Requirements:</u></b></p> <ul style="list-style-type: none"> <li><b>A. <u>Control of Visible Emissions</u></b>            See Monitoring Requirements.</li> <li><b>B. <u>Control of Sulfur Oxides</u></b>            See Monitoring Requirements.</li> <li><b>C. <u>Control of Nitrogen Oxides</u></b>            See Monitoring Requirements.</li> <li><b>D. <u>Operational Standard</u></b>            See Monitoring Requirements.</li> </ul>
<p><b>3.3</b></p>	<p><b><u>Monitoring Requirements:</u></b></p> <ul style="list-style-type: none"> <li><b>A. <u>Control of Visible Emissions</u></b>            The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. <b>[Reference: COMAR 26.11.03.06C]</b></li> <li><b>B. <u>Control of Sulfur Oxides</u></b>            The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitations on the sulfur content in fuel oil. <b>[Reference: COMAR 26.11.03.06C]</b></li> </ul>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3**

	<p><b>C. <u>Control of Nitrogen Oxides</u></b> The Permittee shall develop and maintain an operating and maintenance plan to minimize NO<sub>x</sub> emissions. <b>[Reference: COMAR 26.11.09.08F(1)(b)]</b></p> <p><b>D. <u>Operational Standard</u></b> See Record keeping and Reporting Requirements.</p>
<p><b>3.4</b></p>	<p><b><u>Record Keeping Requirements:</u></b> <b>NOTE:</b> All records must be maintained for a period of 5 years. <b>[Reference: COMAR 26.11.03.06.C (5)(g)]</b></p> <p><b>A. <u>Control of Visible Emissions</u></b> The Permittee shall maintain operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. <b>[Reference: COMAR 26.11.03.06C].</b></p> <p><b>B. <u>Control of Sulfur Oxides</u></b> The Permittee shall retain fuel supplier certifications stating that the fuel oil is in compliance with this regulation. <b>[Reference: COMAR 26.11.09.07C].</b></p> <p><b>C. <u>Control of Nitrogen Oxides</u></b> The Permittee shall maintain:</p> <ol style="list-style-type: none"> <li>1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan. <b>[Reference: COMAR 26.11.09.08F(1)(c)]</b></li> <li>2) Record of training program attendance for each operator. <b>[Reference: COMAR 26.11.09.08F(1)(e)]</b></li> <li>3) An operations manual and preventive maintenance plan. <b>[Reference: COMAR 26.11.09.08F(1)(b)]</b></li> <li>4) Records of fuel use that demonstrate that the boiler meets the definition of a space heater. <b>[Reference: COMAR 26.11.09.08K(3) and COMAR 26.11.03.06C]</b></li> </ol> <p><b>D. <u>Operational Standard:</u></b> The Permittee shall keep monthly records of the type and quantity of fuel used in the boilers. <b>[Reference: COMAR 26.11.03.06C]</b></p>
<p><b>3.5</b></p>	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> The Permittee shall report incidents of visible emissions in accordance</p>

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 3</b>	
	<p>with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".</p> <p><b>B. <u>Control of Sulfur Oxides</u></b>            The Permittee shall report fuel supplier certifications to the Department upon request. <b>[Reference: COMAR 26.11.09.07C]</b></p> <p><b>C. <u>Control of Nitrogen Oxides</u></b>            The Permittee shall submit: a record of training program attendance for each operator to the Department upon request. <b>[Reference: COMAR 26.11.09.08F(1)(e)]</b></p> <p><b>D. <u>Operational Standard</u></b>            The Permittee shall report the type and quantity of fuel used in the boilers in the annual emission certification report. <b>[Reference: COMAR 26.11.03.06C]</b></p>

<b>Table IV – 3A Power Plant Boilers</b>	
3.0A	<p><b><u>Emissions Unit Numbers: B1 &amp; B2 (Boilers)</u></b></p> <p><b>MDE Reg. No. 4-1621 &amp; 4-1622</b>            Two (2) Weil McLain No. 2 fuel oil fired boilers each rated at 2.049 million Btu per hour heat input, with biogas from the LPP serving as the secondary fuel. These boilers are located on-site at the leachate pre-treatment plant and are used for pre-heating leachate and for heating building space.</p>
3.1A	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b><u>National Emissions Standards for Hazardous Air Pollutants (NESHAP). – [40 CFR 63, Subpart JJJJJJ]</u></b></p> <p><b>§ 63.11193 Am I subject to this subpart?</b>            "You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195."</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3A  
Power Plant Boilers**

**§63.11194 What is the affected source of this subpart?**

“(a) This subpart applies to each new, reconstructed, or **existing** affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source of this subpart is the collection of all **existing** industrial, commercial, and institutional boilers within a subcategory, as listed in §63.11200 and defined in §63.11237, located at an area source.”

**§63.11196 What are my compliance dates?**

“(a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.

(1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.

(2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.

(3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.”

**§63.11200 What are the subcategories of boilers?**

The subcategories of boilers, as defined in §63.11237 are:

(a) .....

(b) .....

(c) .....

(d) .....

(e) Oil-fired boilers with heat input capacity of equal to or less than 5 million British thermal units (Btu) per hour.”

**§63.11210 What are my initial compliance requirements and by what date must I conduct them?**

“(a) .....

(b) .....

(c) For **existing** affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 and according to the applicable provisions

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3A  
Power Plant Boilers**

in §63.7(a)(2), except as provided in paragraph (j) of this section.”

**Table 2 to Subpart JJJJJJ of Part 63 – Work Practice Standards, Emission Reduction Measures, and Management Practices**

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory . . .	You must meet the following . . .
12. Existing oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr.	Conduct an initial tune-up as specified in § 63.11214, and conduct a tune-up of the boiler every 5 years as specified in § 63.11223.

All reports and notifications required under 40 CFR 63, Subpart JJJJJJ shall be submitted to the Compliance Program of the Department’s Air and Radiation Administration.

3.2B

**Testing Requirements:**

**National Emissions Standards for Hazardous Air Pollutants (NESHAP). – [40 CFR 63, Subpart JJJJJJ]**

**§63.11223 How do I demonstrate continuous compliance with the work practice and management practice standards?**

“(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.” [Reference 40 CFR, §63.11223(a)&(b)]

3.3C

**Monitoring Requirements:**

The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [Reference: 40 CFR §63.11205(a)]

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3A  
 Power Plant Boilers**

3.4D	<p><b>Record Keeping Requirements:</b>  <b>Note:</b> All records must be maintained for a period of 5 years.  <b>[Reference: COMAR 26.11.03.06C(5)(g)]</b></p> <ol style="list-style-type: none"> <li>1. "You must maintain the records specified in paragraphs (c)(1) through (7) of this section.       <ol style="list-style-type: none"> <li>(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.</li> <li>(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.           <ol style="list-style-type: none"> <li>(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned." <b>[Reference 40 CFR, §63.11225(c)]</b></li> </ol> </li> </ol> </li> <li>2. "Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment." <b>[Reference: 40 CFR §63.11225(c)]</b></li> <li>3. "Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation." <b>[Reference: 40 CFR §63.11225(c)]</b></li> <li>4. "You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.       <ol style="list-style-type: none"> <li>(i) The date, place, and time of the monitoring event.</li> <li>(ii) Person conducting the monitoring.</li> <li>(iii) Technique or method used.</li> <li>(iv) Operating conditions during the activity.</li> <li>(v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that</li> </ol> </li> </ol>
------	--

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 3A Power Plant Boilers</b>	
	<p>monitoring indicated proper operation.</p> <p>(vi) Maintenance or corrective action taken (if applicable)." <b>[Reference: 40 CFR §63.11225(c)]</b></p> <p>5. "Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years. <b>[Reference: 40 CFR §63.11225(d)]</b></p>
3.5E	<p><b><u>Reporting Requirements:</u></b></p> <p>1. "(a) You must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.</p> <p>(1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.</p> <p>(2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.</p> <p>(3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.</p> <p>(4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.</p> <p>(i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 3A  
Power Plant Boilers**

performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.

(ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."

(iii) "This facility has had an energy assessment performed according to §63.11214(c)."

(iv) For units that install bag leak detection systems: "This facility complies with the requirements in §63.11224(f)."

(v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.

(5) If you are using data from a previously conducted emission test to serve as documentation of conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.

(b) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 3A Power Plant Boilers</b>	
	<p>(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:</p> <p>(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."</p> <p>(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."</p> <p>(iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."</p> <p>(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.</p> <p>(4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure." <b>[Reference: 40 CFR §63.11225(a)&amp;(b)]</b></p>

<b>Table IV–4</b>	
<b>4.0</b>	<b><u>Emissions Unit Number(s)</u>: – (LLP) Leachate Pretreatment Plant</b>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV-4**

	<p><b>MDE Reg. No. 9-0813</b> Leachate from Area B is collected in two on-site leachate storage tanks (750,000 gallons each) and is pretreated at the on-site Leachate Pretreatment Plant (LPP). The leachate treatment system consists of pH control, a flocculation basin, primary clarifier, biological treatment, and sludge collection system. Wastewater effluent from the leachate pretreatment plant is discharge into WSSC sanitary sewer system. Volatiles that are emitted from various stages of the LPP are collected and directed to a fume scrubber (FS1) by blowers.</p>
4.1	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>  <b>COMAR 26.11.06.02C(2) – <u>Visible Emission Standards.</u></b>          “A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”  <b><u>Exceptions. COMAR 26.11.06.02A(2).</u></b>          “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment if:          The visible emissions are not greater than 40 percent opacity; and          The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p><b>B. <u>Control of Particulate Matter</u></b>  <b>COMAR 26.11.06.03B(2)(a) – <u>Particulate Matter from Confined Sources.</u></b>          “A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr./SCFD (68.7 mg/dscm).”</p> <p><b>C. <u>Operational Standard</u></b>          The Permittee shall only burn the gases discharged by the baffled anaerobic reactor either in a flare or one or both of the boilers at the leachate pretreatment plant on site previously permitted by the Department (Permit No, 16-4-1621N and 1622 N). [Reference: MDE PTC 16-9-0813N, Condition 6]</p> <p>The Permittee shall not treat the leachate unless all the required air pollution control equipment is online and operating properly.  <b>[Reference: MDE PTC 16-9-0813N, Condition 7]</b></p>

**BROWN STATION ROAD SANITARY LANDFILL**  
**3500 BROWN STATION ROAD**  
**UPPER MARLBORO, MD 20774**  
**PART 70 OPERATING PERMIT NO. 24-033-02084**

Table IV-4	
4.2	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> See Monitoring Requirements.</p> <p><b>B. <u>Control of Particulate Matter</u></b> See Monitoring Requirements.</p> <p><b>C. <u>Operational Standard</u></b> See Monitoring Requirements</p>
4.3	<p><b><u>Monitoring Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> See Record keeping and Reporting Requirements.</p> <p><b>B. <u>Control of Particulate Matter</u></b> See Record keeping and Reporting Requirements.</p> <p><b>C. <u>Operational Standard</u></b> See Record keeping and Reporting Requirements.</p>
4.4	<p><b><u>Record Keeping Requirements:</u></b></p> <p><b><u>NOTE:</u></b> All records must be maintained for a period of 5 years.  <b>[Reference: COMAR 26.11.03.06.C (5)(g)]</b></p> <p><b>A. <u>Control of Visible Emission</u></b> The Permittee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years.  <b>[Reference: COMAR 26.11.03.06C]</b></p> <p><b>B. <u>Control of Particulate Matter</u></b> The Permittee shall maintain a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of the thermal oxidizer malfunctions and the corrective actions taken to bring into proper operation. <b>[Reference: COMAR 26.11.03.06C].</b></p> <p><b>C. <u>Operational Standard</u></b> The Permittee shall maintain records, for a period of at least five years, of any malfunctions or incidents where the gases from the anaerobic</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV-4</b>	
	<p>reactor are not burned in the flare or boilers. <b>[Reference: COMAR 26.11.03.06C]</b></p> <p>The Permittee shall keep records of operation on site for at least five years and make these records available to the Department upon request. <b>[Reference: MDE PTC 12-9-0813N, Condition 9]</b></p>
<b>4.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, "Report of Excess Emissions and Deviations. <b>[Reference: COMAR 26.11.03.06C]</b></p> <p><b>B. <u>Control of Particulate Matter</u></b> See Record Keeping Requirements.</p> <p><b>C. <u>Operational Standard</u></b> The Permittee shall report incidents where the gases from the anaerobic reactor are not burned in the flare or boilers in accordance with COMAR 26.11.01.07 and COMAR 26.11.03.06C(7). <b>[Reference: COMAR 26.11.03.06C]</b></p>

<b>Table IV - 5</b>	
<b>5.0</b>	<p><b><u>Emissions Unit Number(s): - (PP) Power Plant</u></b></p> <p><b>MDE Reg. No. 9-1364</b></p> <p>This is a 4.2 MW electrical energy power facility with four (4) landfill gas (LFG) fired internal combustion engine/generators sets. Two of these units can also be operated on propane. Each engine generator is rated at 1,050 kW and has a maximum LFG input rate of 21,960 cubic feet per hour.</p>
<b>5.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> <b>COMAR 26.11.09.05E - <u>Stationary Internal Combustion Engine Powered Equipment.</u></b> "(2) Emissions During Idle Mode. A person may not cause or permit the</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 5**

discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

(3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(4) Exceptions.

(a) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

(b) Section E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

(i) Engines that are idled continuously when not in service: 30 minutes;

(ii) All other engines: 15 minutes.

(c) Section E(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics."

**B. Operational Standard**

1. The Certificate of Public Convenience and Necessity (CPCN) constitutes the air quality permit to construct for the Prince George's County Brown Station Road Landfill Project. All CPCN requirements, which apply, to the County shall apply to all subsequent owners and/or operators of the facility. **[Reference: PSC Case No. 8838]**

2. The Permittee shall burn only collected landfill gas (LFG), or propane gas, unless the Permittee applies for and receives an approval or permit from the Department to burn alternative fuels. **[Reference: COMAR 26.11.02.09A and PSC Case No. 8838]**

3. The Permittee shall ensure that short-term emissions from each engine do not exceed the following rates: NO<sub>x</sub> - 1.99 lbs/hr. **[Reference: PSC Case No. 8838, dated April 22, 2005]:**

4. The Permittee shall ensure that the net increase of NO<sub>x</sub> emissions due to modifications to the electric generation system do not exceed 25 TPY on a rolling 12-month basis. The combined power output of the four-generator/engine sets shall not exceed 30,656,000 kWh/yr. **[Reference: PSC Case No. 8838]**

Note: The above power rating is based on maximum NO<sub>x</sub> emissions from the four engine/generator sets of 29.1 TPY and a 4.2 TPY source-wide NO<sub>x</sub> emission reduction due to the removal of the existing compressors, therefore resulting in a net emissions increase not to exceed 24.9 TPY.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 5**

5. As part of the requirements in 40 CFR, Subpart 63, the Permittee shall comply with the following requirement, except during periods of startup (Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions):

Excerpts from Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in §§ 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

<b>For each . . .</b>	<b>You must meet the following requirement, except during periods of startup . . .</b>	<b>During periods of startup you must . . .</b>
13. Non-emergency, non-black start stationary RICE which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; <sup>1</sup> b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.	

<sup>1</sup> Sources have the option to utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

<sup>2</sup> If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. **[Reference: 40 CFR §63.6603(a), §63.6625(h), and Table 2d to 40 CFR 63, Subpart ZZZZ]**

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 5**

	<p>6. As part of the requirements in 40 CFR, Subpart 63, the Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. <b>[Reference: 40 CFR §63.6625(e), §63.6640(a), and Table 6 to 40 CFR 63, Subpart ZZZZ]</b></p>
<p>5.2</p>	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>        See Record keeping and Reporting Requirements.</p> <p><b>B. <u>Operational Standard</u></b></p> <ol style="list-style-type: none"> <li>1. See Monitoring Requirement.</li> <li>2. See Monitoring Requirement.</li> <li>3. See 4.</li> <li>4. The Permittee shall submit a test protocol to ARA for review and approval at least 30 days prior to conducting any compliance stack test. <b>[Reference: PSC Case No. 8838]</b>          Compliance with stack testing shall be conducted in accordance with ARA Technical Memorandum <sup>TM</sup> 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991), as amended by Supplement 1 (1 July 1991), 40 CFR 51, 40 CFR 60, subsequent test protocols approved by ARA. Tests ports shall be located in accordance with TM 91-01 (January 1991), or subsequent alternative measures approved by ARA. <b>[Reference: PSC Case No. 8838]</b>          Testing shall be performed when operating at a minimum of 90 percent of the design engine load. If testing cannot be performed at 90 percent of the engine load, then the actual engine load during testing shall become the allowable permitted engine load. <b>[Reference: PSC Case No. 8838]</b>          The Permittee may be required to conduct additional stack tests at any time in accordance with COMAR 26.11.01.04A.</li> </ol>
<p>5.3</p>	<p><b><u>Monitoring Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>        The Permittee shall properly operate and maintain the engines in a manner to minimize visible emissions. <b>[Reference: COMAR 26.11.03.06C]</b></p>

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 5**

	<p><b>B. <u>Operational Standard</u></b>          See Reporting Requirements.</p>
5.4	<p><b><u>Record Keeping Requirements:</u></b>  <b>NOTE:</b> All records must be maintained for a period of 5 years.  <b>[Reference: COMAR 26.11.03.06.C (5)(g)]</b></p> <p><b>A. <u>Control of Visible Emissions</u></b>          The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request. <b>[Reference: COMAR 26.11.03.06C]</b></p> <p><b>B. <u>Operational Standard</u></b></p> <ol style="list-style-type: none"> <li>1. See Reporting Requirements.</li> <li>2. The Permittee shall maintain operations logs, which show the amounts of propane and/or landfill gas burned. <b>[Reference: COMAR 26.11.03.06C]</b></li> <li>3. See Reporting Requirements.</li> <li>4. See Reporting Requirements.</li> </ol>
5.5	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>          The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, "Report of Excess Emissions and Deviations."</p> <p><b>B. <u>Operational Standard</u></b></p> <ol style="list-style-type: none"> <li>1. In the event of any change in control or ownership, the County shall notify the succeeding owner/operator in writing of the requirements imposed by the CPCN. The Permittee shall also send ARA a copy of the written notification referenced above. <b>[Reference: PSC Case No. 8838]</b></li> <li>2. Same as Recording Requirement.</li> <li>3. Same as Recording Requirement.</li> <li>4. Copies of reports required by change of ownership, stack test protocols, stack testing, and major milestones as described above shall be sent to the Power Plant Research Program at:</li> </ol> <p style="margin-left: 40px;">Power Plant Assessment Division          Department of Natural Resources          Tawes State Office Building, B-3</p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

<b>Table IV – 5</b>	
	580 Taylor Avenue Annapolis, Maryland 21401 <b>[Reference: PSC Case No. 8838].</b>

<b>Table IV – 6</b>	
<b>6.0</b>	<p><b><u>Emissions Unit Number(s): GB1 &amp; GB2</u></b></p> <p><b>MDE Reg. No. 5-1670</b> Two (2) Weil McLain LFG fired boilers with propane as standby fuel, each rated at 1.01 million Btu per hour heat input used to provide building heating. The LFG consumption is 33.7 scfm each.</p>
<b>6.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>  <b>COMAR 26.11.09.05A(2) – <u>Fuel Burning Equipment.</u></b>  “(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.  <b>(3) <u>Exceptions.</u></b>  Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:  (a) The visible emissions are not greater than 40 percent opacity; and  (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>  <b>COMAR 26.11.09.08B(5) – <u>Operator Training.</u></b>  (a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.  (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”</p> <p><b>COMAR 26.11.09.08F – <u>Requirements for Space Heaters.</u></b></p>

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Table IV – 6**

	<p>“(1) A person who owns or operates a space heater as defined in Regulation .01B of this chapter shall:</p> <p>(a) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation;</p> <p>(b) Develop an operating and maintenance plan to minimize NOx emissions based on the recommendations of equipment vendors and other information including the source’s operating and maintenance experience;</p> <p>(c) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;</p> <p>(d) Require installation operators to attend in-State operator training programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and</p> <p>(e) Prepare and maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request.</p> <p>(2) A person who owns or operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date when the fuel-burning equipment did not qualify, and shall meet the applicable fuel-burning equipment RACT requirement in this regulation.”</p> <p><b>C. <u>Operational Standard</u></b> The Permittee shall only burn LFG or propane, unless the Permittee applies for and receives an approval or permit from the Department to burn an alternate fuel. <b>[Reference: COMAR 26.11.02.09A]</b></p>
6.2	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> See Record keeping and Reporting Requirements.</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b> See Record keeping and Reporting Requirements.</p> <p><b>C. <u>Operational Standard</u></b> See Record keeping and Reporting Requirements.</p>
6.3	<p><b><u>Monitoring Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. <b>[Reference: COMAR</b></p>

**BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD  
 UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

Table IV – 6

	<p><b>26.11.03.06C]</b></p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>          The Permittee shall develop and maintain an operating and maintenance plan to minimize NO<sub>x</sub> emissions. [Reference: COMAR 26.11.09.08F(1)(b)]</p> <p><b>C. <u>Operational Standard</u></b>          See Reporting Requirements.</p>
<p>6.4</p>	<p><b><u>Record Keeping Requirements:</u></b>  <b>NOTE:</b> All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06.C (5)(g)].</p> <p><b>A. <u>Control of Visible Emissions</u></b>          The Permittee shall maintain operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. [Reference: COMAR 26.11.03.06C]</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>          The Permittee shall maintain:</p> <ol style="list-style-type: none"> <li>1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan. [Reference: COMAR 26.11.09.08F(1)(c)]</li> <li>2) Record of training program attendance for each operator. [Reference: COMAR 26.11.09.08F(1)(e)]</li> <li>3) An operations manual and preventive maintenance plan. [Reference: COMAR 26.11.09.08F(1)(b)]</li> <li>4) Records of fuel use that demonstrate that the boiler meets the definition of a space heater. [Reference: COMAR 26.11.09.08K(3) and COMAR 26.11.03.06C]</li> </ol> <p><b>C. <u>Operational Standard</u></b>          The Permittee shall keep monthly records of type and quantity of fuel used in the boilers. [Reference: COMAR 26.11.03.06C]</p>
<p>6.5</p>	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b>          The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations."</p>

BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084

Table IV – 6

**B. Control of Nitrogen Oxides**

The Permittee shall submit: a record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08F(1)(e)]

**C. Operational Standard**

The Permittee shall report the monthly records of the type and quantity of fuel used in the boilers in the annual certification report. [Reference: COMAR 26.11.03.06C]

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**SECTION V      INSIGNIFICANT ACTIVITIES**

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1)    4      Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

Four (4) emergency generators (EGs): one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, one (1) 30 kW Katolight (Model DFEG5938496 KW) diesel-fired EG located at Scale House, one (1) 350 kW Cummins diesel-fired EG located at Leachate Pretreatment Plant, and one (1) 40 kW Cummins (Model CD03C-1832767 KW) diesel-fired EG located at the Administration Buildings.

The engine is subject to the following requirements:

- (A) COMAR 26.11.09.05E(2) – Emissions During Idle Mode.  
The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (B) COMAR 26.11.09.05E(3) – Emissions During Operating Mode.  
The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (C) Exceptions:
  - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
  - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (a) Engines that are idled continuously when not in service: 30 minutes
- (b) all other engines: 15 minutes.

- (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.

**THESE REQUIREMENTS APPLY TO THE FOLLOWING UNITS:**

one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, and

one (1) 350 kW Cummins diesel-fired EG located at Leachate Pretreatment Plant.

National Emission Standards for Hazardous Air Pollutants  
**40 CFR, Subpart 63 – Emergency Stationary CI Reciprocating Internal Combustion Engines.**

1. The Permittee shall comply with the following requirement, except during periods of startup (Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions):

Excerpts from Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in §§ 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

<b>For each . . .</b>	<b>You must meet the following requirement, except during periods of startup . . .</b>	<b>During periods of startup you must . . .</b>
4. Emergency stationary CI RICE and black start stationary CI RICE. <sup>2</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup>	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every	

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

	500 hours of operation or annually, whichever comes first, and replace as necessary.	
--	--	--

1 Sources have the option to utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

2 If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

2. The Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **[Reference: 40 CFR §63.6625(e), §63.6640(a), and Table 6 to 40 CFR 63, Subpart ZZZZ]**
  
3. The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5.

If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. **[Reference: 40 CFR §63.6625(i)]**

BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084

- (2)  Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (3) Containers, reservoirs, or tanks used exclusively for:
- (a)  Storage of butane, propane, or liquefied petroleum, or natural gas;
- (b) No. 18 Storage of lubricating oils;
- (c) No. 4 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
- (d) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
- (4)  First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**SECTION VI STATE ONLY ENFORCEABLE CONDITIONS**

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

- (A) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

For the Flares Only

- (B) COMAR 26.11.42 – Control of Methane Emissions from Municipal Solid Waste Landfills.

COMAR 26.11.42.01(A) – Applicability and Exemptions.

"This chapter applies to a person who owns or operates a municipal solid waste (MSW) landfill that has accepted waste after November 8, 1987."

COMAR 26.11.42.05(B)(2) – Standard and Requirements for Gas Collection and Control Systems. – Requirements for Enclosed Flares.

"(a) An owner or operator of a MSW landfill that routes landfill gas to an enclosed flare shall achieve a methane destruction efficiency of at least 99 percent by weight and meet the following specifications:

(i) The device shall be equipped with automatic dampers, an automatic shutdown device, a flame arrester, and continuous recording temperature sensors; and

(ii) The device shall have a sufficient flow of propane, natural gas, or another fuel source approved by the Department to the pilot light to prevent unburned collected methane from being emitted to the atmosphere during restart and startup.

(b) The owner or operator of a MSW landfill shall install, calibrate, operate and maintain the flare system in accordance with the manufacturer's specifications and if applicable, within the parameter ranges established in the landfill's permit to construct issued by the Department.

(c) An owner or operator that used an enclosed flare shall install, calibrate, and maintain a gas flow rate measuring device that either records the flow to the control device at least every 15 minutes or

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

secures the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration.”

(C) COMAR 26.11.42.05(B)(7)(a) thru (k) – Standard and Requirements for Gas Collection and Control Systems. – Performance Test Requirements.

“(a) The owner or operator shall conduct annual performance tests for any gas control device(s) subject to the requirements of §B(2), (3) & (4) of this regulation using the test methods identified in Regulation .11C of this chapter.

(b) An initial performance test shall be conducted within 180 days of start-up of the gas collection and control system.

(c) Following an initial performance test, the owner or operator shall conduct a complete annual performance test no later than 45 days following the 1-year anniversary date of the initial performance test.

(d) The owner or operator of an existing gas control device shall demonstrate compliance with this regulation no later than 180 days following the effective date of this regulation in accordance with the test methods and procedures specified in Regulation .11C of this regulation.

(e) The owner or operator shall conduct performance tests under conditions specified by the Department based on representative performance of the affected source for the period being tested.

(f) Representative conditions shall exclude periods of startup and shutdown unless specified by the Department.

(g) The owner or operator may not conduct performance tests during periods of malfunction.

(h) The owner or operator shall record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation.

(i) The owner or operator shall make available records necessary to determine the conditions of performance tests available upon request by the Department.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(j) If a gas control device remains in compliance after three consecutive performance tests, the owner or operator may conduct the performance test every 3 years.

(k) Once a gas control device is placed on the 3-year performance test schedule, if a subsequent performance test shows the gas collection and control system is out of compliance with the requirements of this regulation, the performance testing frequency shall return to annual."

(D) COMAR 26.11.42.09(B)(1) – Monitoring Requirements and Corrective Actions. – Gas Control System Equipment Monitoring.

"The owner or operator shall monitor the gas control system using the following procedures:

(1) For enclosed combustors (including enclosed flares), the following equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications:

(a) A temperature monitoring device equipped with a continuous recorder which has an accuracy of plus or minus ( $\pm$ ) 1 percent of the temperature being measured expressed in degrees Celsius or Fahrenheit; and

(b) A device which records the gas flow to the control device(s) and bypass of the control device. The owner or operator shall:

(i) Install, calibrate, and maintain a gas flow rate measuring device that records the flow to the control device at least every 15 minutes;

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; and

(iii) Perform a visual inspection of the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

(c) A temperature monitoring device is not required for boilers and process heaters with a design heat input capacity of 44 megawatts (150 MMBtu/hr) or greater."

(E) COMAR 26.11.42.09(B)(9) – Monitoring Requirements and Corrective Actions. – Gas Control System Equipment Monitoring.

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

“For a gas treatment system, the following equipment shall be installed, calibrated, maintained, and operated according to the manufacturer’s specifications:

(a) A device which records the gas flow to the treatment system and bypass if applicable.

(b) The owner or operator shall:

(i) Install, calibrate, and maintain a gas flow rate measuring device that records the flow to the treatment system at least every 15 minutes;

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; and

(iii) Perform a visual inspection of the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.”

(F) COMAR 26.11.42.10 – Recordkeeping and Reporting Requirements.

COMAR 26.11.42.10B(1)(a), (b), and (m) – Recordkeeping Requirements.

“An owner or operator of a MSW landfill shall maintain the following records for at least 5 years:

(a) All gas collection system downtime exceeding 5 days, including dates of downtime, individual well shutdown and disconnection times, the reason for the downtime, and any corrective actions conducted in response to the downtime;

(b) All gas control system downtime in excess of 1 hour, the reason for the downtime, and the length of time the gas control system was shut down, and any corrective actions conducted in response to the downtime;”

.....

(m) Records of the gas control system equipment operating parameters specified to be monitored under Regulation .09B of this chapter as well as records for periods of operation during which the

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

parameter boundaries established during the most recent performance test are exceeded. The records shall include the following information:

(i) For enclosed flares, all 3-hour periods of operation during which the average temperature difference was more than 28°C (50° F) below the average combustion temperature during the most recent performance test at which compliance with Regulations .05B(2) and (3) of this chapter was determined;”

COMAR 26.11.42.10C – Reporting Requirements.

COMAR 26.11.42.10C(2) – Equipment Removal Report.

“(a) A gas collection and control system equipment removal report shall be submitted to the Department 30 days prior to well capping, removal, or cessation of operation of the gas collection, treatment, or control system equipment.

(b) The report shall contain the following information:

- (i) A copy of the closure notification submitted to the Department in accordance with §C(1) of this regulation;
- (ii) A copy of the initial performance test report or other documentation demonstrating that the gas collection and control system has been installed and operated for a minimum of 15 years, unless the owner or operator can demonstrate that due to declining methane rates the MSW landfill is unable to operate the gas collection and control system for a 15-year period;”

(G) COMAR 26.11.42.10C(7) – Performance Test Report.

“(a) For a control system designed and operated to meet the requirements of this chapter, the owner or operator shall submit a Performance Test Report to the Department that establishes the reduction efficiency or parts per million by volume no later than 180 days after the initial startup of the approved control system using EPA Method 25 or 25C, 40 CFR Part 60, Appendix A.

(b) The owner or operator shall submit any additional performance test reports to the Department within 30 days after

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

the date of completing each performance test, including any associated fuel analyses.”

(c) The performance test report shall include the following information:

- (i) A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, all areas excluded from collection, and the proposed sites for the future collection system expansion;
- (ii) The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;
- (iii) The documentation of the presence of asbestos or non-decomposable material for each area from which collection wells have been excluded based on the presence of asbestos or non-decomposable material;
- (iv) The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;
- (v) The process for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
- (vi) The process for controlling off-site migration.”

The Permittee shall follow the reporting procedures listed in COMAR 26.11.42.10 (A) and (A-1). Test results, reports, or other information, unless otherwise specified by the Department shall be submitted to:

Program Manager  
Air Quality Compliance Program  
Maryland Department of the Environment  
1800 Washington Boulevard, Suite 715  
Baltimore, Maryland 21230  
410-537-4225

Or electronically to:

MDEAIR.OTHERCOMPLIANCE@maryland.gov  
**[Reference: COMAR 26.11.42.10 (A) and (A-1)]**

**BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(H) **COMAR 26.11.42.11(C)(1) – Test Methods and Procedures. –  
Determination of Control Device Destruction Efficiency.**

**“The following methods of analysis shall be used to determine the efficiency of the control device in reducing methane:**

**(1) Enclosed Combustors. One of the following test methods shall be used to determine the efficiency of the control device in reducing methane by at least 99 percent, or in reducing the outlet methane concentration for lean burn engines to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen:**

**(a) U.S. EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;**

**(b) U.S. EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon;**

**(c) U.S. EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer; or**

**(d) U.S. EPA Reference Method 25C, Determination of Nonmethane Organic Compounds in Landfill Gases.”**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**BACKGROUND**

The Brown Station Road Sanitary Landfill (BSRSL) is a municipal solid waste landfill with a primary SIC code of 4953 and NAIC Code 562212. It is located about 2.5 miles northwest of the town of Upper Marlboro, Maryland on Brown Station Road. The landfill facility is owned by the Prince George's County Government, Department of Environmental Resources, Waste Management Division (the County). The landfill encompasses 850-acres and is divided into two primary areas: Area A and B. Area A is a closed landfill that has two separate disposal areas (A1 and A2). Area A is approximately 148 acres in size. Area B, containing eleven planned cells, has been operational since 1992 and it encompasses approximately 140 acres. Waste has been placed in nine cells.

In the current configuration, Area A and Area B incorporate landfill gas (LFG) collection and control systems. The main header pipeline of the LFG collection system splits and directs LFG to a flare station and to three compressors located onsite in the Compressor Building. The flare station contains three (3) enclosed flares (F1, F2, and F3) with minimum designed LFG destruction efficiency of 98 percent. In the Compressor Building, LFG is compressed, dehydrated, and filtered. The treated LFG is routed on-site to a power plant (four LFG-powered electrical generators G1 thru G4) and two (2) boilers in the garage (GB1 and GB2). Excess LFG is also routed off-site to feed three (3) LFG-power electrical generators, six boilers, and three (3) water heaters, all located at the Prince George's County Correctional Facility (two miles away).

A full compliance inspection was performed at the premises on December 8, 2022. At the time of the inspection, it was found that the landfill is no longer sending LFG to the Correctional Facility, and the on-site power plant has not been operating since January 2021. It was also found that Flares 1 and 2 are not operating due to the need for upgrades to their control systems. Therefore, Flare 3 is currently the only control device used for the burning of the collected LFG. During the inspection, Flare 3 was operating to support both Zone A and B.

Leachate from Area B is collected in two on-site leachate storage tanks (750,000 gallons each) and is pretreated at the on-site Leachate Pretreatment Plant (LPP). The leachate treatment system consists of pH control, a flocculation basin, primary clarifier, biological treatment, and sludge collection system. Wastewater effluent from the leachate pretreatment plant is discharged into WSSC sanitary sewer system. Processing of liquid effluent from the primary clarifier in dual up flow anaerobic sludge blanket (UASB) reactors can produce combustible biogas. When produced, the biogas can be used as fuel for two (2) boilers, B1 and B2, located at the leachate treatment plant or it can be burned by a flare (LF1). The flare (LF1) has a minimum design VOC destruction efficiency of 98 percent. Volatiles that are emitted from various stages of the LPP are collected and

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

directed to a fume scrubber (FS1) by blowers. Caustic soda and bleach solution are used as gas scrubbing agents. Two (2) boilers (B1 and B2) that run on No. 2 fuel oil are used to preheat the leachate influent and to heat the building space.

The facility also maintains a few emissions sources that are listed as insignificant activities due to the seasonal use nature and low emission levels. The facility maintains four (4) emergency generators (EGs): one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, one (1) 30 kW Katolight (Model DFEG5938496 KW) diesel-fired EG located at Scale House, one (1) 350 kW Cummins diesel-fired EG located at Leachate Pretreatment Plant, and one (1) 40 kW Cummins (Model CD03C-1832767 KW) diesel-fired EG located at the Administration Buildings. The facility maintains three (3) propane-fired emergency generators: one (1) Onan 75 KW propane-fired EG located at Power Plant, one (1) Generac 22 KW propane-fired located at gasoline pumping station; and one (1) Generac 20 KW (propane) located at the Collection Office across the road from the Landfill. The facility also maintains various space heaters for comfort heat, various containers for the storage of butane, propane, or liquefied petroleum, or natural gas, lubricating oils, and motor vehicle gasoline. The facility also maintains a first aid and emergency medical care area with appropriate sterilization products, and medicine storage cabinets.

The major source thresholds for triggering Title V permitting requirements are the potential to emit 25 tons per year (TPY) of NO<sub>x</sub>, 25 TPY of VOC, or 100 TPY of any other criteria pollutant. The actual NO<sub>x</sub> and VOCs emissions from BSRSL are higher than the major source thresholds. As a result, BSRSL is required to obtain and maintain a Part 70 operating permit under COMAR 26.11.03.01.

The current Part 70 (Title V) permit was issued to the BSRSL on November 1, 2016, with an expiration date of October 31, 2021. The BSRSL prepared a Part 70 (Title V) renewal permit application, and it was received by the Department on November 5, 2020. An administrative completeness review was conducted, and the application was deemed to be administratively complete. A completeness determination letter was sent to BSRSL on November 18, 2020 granting this facility an application shield.

**CAM Analysis**

Compliance Assurance Monitoring (CAM) applies to any emission unit at a Title V source that meets the following criteria:

- The emission unit is subject to a federally enforceable emission limit or standard for a regulated pollutant;

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- The emission unit uses a control device to achieve compliance with any such emission limitation;
- The emission unit has the potential to emit pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year required for a source to be classified as a major source and must not otherwise be exempt from CAM.

Brown Station Road Sanitary Landfill is not typically a major source of air pollutants, but it has a design capacity which is greater than the 2.75 million tons threshold, making it subject to the Title V permitting requirements. The BSRSL voluntarily installed a LFG control system to capture methane emissions produced through waste decomposition. The collected gas is sent and used to power four internal combustion engines used in the generation of electrical power. The landfill itself is not subject to limitations on the emissions of particulates, sulfur oxides, nitrogen oxides, or VOCs. In addition, potential uncontrolled emission levels are well below the major threshold.

The BSRSL also maintains three (3) flares, four (2) fuel oil fired boilers to support site operations, and a leachate treatment process. These emission units are subject to emissions limitations of particulate matter, sulfur oxides, nitrogen oxides, and/or VOC; however there are no devices employed to control particulate matter, sulfur oxides, nitrogen oxides, or VOC. CAM requirements, therefore, are not applicable to these units.

BSRSL did not submit a Compliance Assurance Monitoring (CAM) analysis for the facility, but the Department has determined that the facility is not subject to the CAM Rule 40 CFR Subpart 64. BSRSL does not use any control device to achieve compliance with CAM Rule 40 CFR, Subpart 64. CAM is not applicable because the BSRSL is subject to an emissions limitation that was proposed by the EPA administrator after November 15, 1990 pursuant to Sections 111 or 112 of the Clean Air Act (specifically, the facility is subject to the Federal Plan Requirements for municipal solid waste landfills that commenced construction on or before July 17, 2014 and have not been modified or reconstructed since July 17, 2014 - 40 CFR Part 62 Subpart OOO).

**MACT**

EPA promulgated national emission standards for hazardous air pollutants for existing and new municipal solid waste (MSW) landfills - 40 CFR Part 63 – Subpart AAAA. Brown Station Road Sanitary Landfill is subject to these MACT requirements because it is a MSW landfill that has accepted waste since November 8, 1987 and is an area source landfill that has a design capacity equal to or greater than 2.5 million cubic meters that was not permanently closed as of January 16, 2003. BSRSL must comply with the MACT requirements when the

**PART 70 OPERATING PERMIT FACT SHEET  
 BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

facility NMOC emissions exceed 50 Mg/year (currently, they do exceed this threshold).

The following Table 1 summarizes the actual emissions from the Brown Station Road Sanitary Landfill based on its Annual Emission Certification Reports:

**Table 1: Actual Emissions**

Year	NOx (TPY)	SOx (TPY)	PM10 (TPY)	CO (TPY)	VOC (TPY)
2015	7.91	0.93	5.66	37.38	21.58
2016	7.96	0.99	7.11	41.78	24.03
2017	6.55	0.81	3.53	37.89	18.74
2018	6.51	1.00	6.37	38.54	25.67
2019	6.43	0.79	7.58	30.1	26.57
2020	13.50	1.48	29.95	34.88	9.75
2021	13.11	1.42	38.26	7.99	20.92

The following Table 2 summarizes the calculated and projected NMOC generation rates for the facility, as shown in the Title V application.

**Table 2: Summary of projected NMOC generation rates**

Year	Area A NMOC (Mg/yr)	Area B NMOC (Mg/yr)
2021	25.99	93.45
2022	24.98	94.94
2023	23.99	96.48
2024	23.06	98.06
2025	22.15	99.68
2026	21.29	101.35

Prince George's County is located in Area III, which is classified as an ozone non-attainment area. The major source thresholds for triggering Title V permitting for this area under Part 70 rule are the potential to emit 25 TPY of VOC, 10 TPY of any single HAP, 25 TPY of any combination of HAPs, or 100 TPY of any other criteria pollutant.

**PART 70 OPERATING PERMIT FACT SHEET  
 BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**GREENHOUSE GAS (GHG) EMISSION STATEMENT**

There are no greenhouse gas related Clean Air Act requirements applicable to Brown Station Road Sanitary Landfill. Furthermore, the BSRSL has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions. BSRSL emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various processes (i.e., waste decomposition, landfill gas fugitives, and fuel burning) contained within the facility premises applicable to BSRSL. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements.

Methane and carbon dioxide emissions originate as fugitive emissions from the landfill itself. Emission estimates were based using default data entered in the US EPA LandGEM model, version 3.02 (see Table 3 shown below). Site-specific LFG composition is used for the estimation of fugitive CO<sub>2</sub>. In addition, carbon dioxide emissions are also produced through the burning of landfill gas at the onsite power plant, and flaring equipment. Emissions were estimated using site-specific CH<sub>4</sub> and CO<sub>2</sub> contents on LFG, and appropriate AP-42 emission factors for each of the fuel burning equipment on site. Furthermore, the Permittee shall quantify facility wide GHG emissions and report them in accordance with Section 3 of the Part 70 Permit.

The following Table 3 summarizes the actual emissions from BSRSL based on emission estimates using the LandGEM model and information submitted in the Part 70 Permit Application:

**Table 3: Greenhouse Gases Emissions Summary (Year 2019)**

<b>GHG</b>	<b>Conversion factor</b>	<b>2019 tpy CO<sub>2eq</sub></b>
Carbon dioxide, CO <sub>2</sub>	<b>1</b>	<b>66,005</b>
Methane, CH <sub>4</sub>	<b>25</b>	<b>9,023</b>
Nitrous Oxide, N <sub>2</sub> O	<b>298</b>	<b>0.10</b>
<b>Total GHG, CO<sub>2eq</sub></b>		<b>75,028</b>

Note: the N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub> emissions from fugitive LFG are not quantified due to the absence of AP-42 emission factors.

**PART 70 OPERATING PERMIT FACT SHEET  
 BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

**EMISSION UNIT IDENTIFICATION**

The following Table 4 presents the emission units have been identified at Brown Station Road Sanitary Landfill, as being subject to the Title V permitting requirements and having applicable requirements.

**Table 4: Emission Unit Identification**

<b>MDE Registration Number</b>	<b>Emissions Unit Number</b>	<b>Emissions Unit Description</b>	<b>Date of Registration</b>
A		Area A: 148-acre area of closed and capped landfill, which incorporates a LFG collection system.	03/1968 (Closed)
B		Area B: 140-acre area of landfill containing eleven planned cells.	06/1992 (Active)
F1 and F2	9-0821	Flare Station: Two (2) enclosed flares (F1 and F2) each rated at 45 million Btu per hour	10/1995
F3	033-2084-9-1361	Flare Station: F3: One (1) enclosed flare rated at 90 million Btu per hour	10/2014
B1 and B2	4-1621 and 4-1622	Two (2) boilers, each rated at 2.049 million Btu per hour, are located at on-site leachate pretreatment plant and are used for pre-heating leachate and the building space.	01/1997
LPP	9-0813	The Leachate Pretreatment Plant (LPP) pre-treats leachate from Area B before sending it to the sanitary sewer.	01/1997
PP	033-2084-9-1364	4.2 MW generating facility consisting of four engine generators that use LFG as primary fuel [PSC Case No. 8838, dated April 22, 2005]	04/2003

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

MDE Registration Number	Emissions Unit Number	Emissions Unit Description	Date of Registration
GB1 and GB2	5-1670	Garage Boilers: Two (2) boilers each rated at 1.01 million Btu per hour to provide building heating	Installed 07/2018. Registered 12/ 2020.

The facility also maintains a few emissions sources that are listed as insignificant activities due to the seasonal use nature and low emission levels. The facility maintains four (4) emergency generators (EGs): one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, one (1) 30 kW Katolight (Model DFEG5938496 KW) EG located at Scale House, one (1) 350 kW Cummins EG located at Leachate Pretreatment Plant, and one (1) 40 kW Cummins (Model CD03C-1832767 KW) EG located at the Administration Buildings. The facility maintains three (3) propane-fired emergency generators (EGs): one (1) Onan 75 KW EG located at the Power Plant, one (1) Generac 22 KW EG located at the gasoline pumping station, and one (1) Generac 20 KW EG located at the Collection Office across the road from the Landfill. The facility also maintains various space heaters for comfort heat, various containers for the storage of butane, propane, or liquefied petroleum, or natural gas, lubricating oils, and motor vehicle gasoline. The facility also maintains a first aid and emergency medical care area with appropriate sterilization products, and medicine storage cabinets.

**CHANGES SINCE THE LAST RENEWAL**

During this period, the Permittee replaced the two (2) existing garage boilers with new ones. The two (2) new boilers, each rated at 1.01 million Btu per hour were installed in July 2018. However, the boilers were permitted through an after-the-fact permit to construct that was issued in July 2020. [The renewed permit incorporates applicable state-only requirements listed in COMAR 26.11.42 for the control of methane emissions from Municipal Solid Waste Landfills. The requirements primarily apply to the enclosed flares located on the premises and have been included in the state-only section of the permit conditions.](#)

**AN OVERVIEW OF THE PART 70 PERMIT**

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

## **REGULATORY AND TECHNICAL REVIEW/COMPLIANCE METHODOLOGY**

### **Emission Unit: A & B**

#### **Area A**

148-acre area of landfill is closed and capped. Area A was active from 1968 to 1992 and contains approximately 7.5 million tons of waste. It incorporates a LFG collection system. LFG from Area A is collected, sent to compressor building for treatment (compression, dehydration, and filtrations), and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

Note: The 2019 Emission Certification Report showed an estimated NMOC generation rate of 28.33 tons per year with a total refuse in place of 7,529,888 tons.

**Area B**

140-acre area of landfill, which contains eleven planned cells. Landfilling in Area B began in 1992 and is presently ongoing. Waste has been placed in nine cells. The design capacity of the landfill is 8.5 million tons. Area B incorporates a LFG collection system. LFG from Area B is collected, sent to compressor building for treatment (compression, dehydration and filtration), and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.

Note: The 2019 Emission Certification Report showed an estimated NMOC generation rate of 94.22 tons per year with a total refuse in place of 8,896,445 tons.

**Compliance Review**

On February 2, 2021, the Air Quality Compliance Program (AQCP) performed a review of the facility's NSPS/MACT semi-annual report (July 1 - December 31, 2020) (report received electronically on January 28, 2021). The facility reported exceedances in well heads pressure, but they were corrected within 15 days. Exceedances in oxygen concentration were also reported, with some instances of which the exceedances could not be corrected within 15 days resulting in those wells being temporarily decommissioned. Nine (9) wells were temporarily decommissioned during the reporting period due to declining gas flows. No well was permanently decommissioned. No well temperature exceedance was reported. No temperature exceedance was reported in any of the three (3) flares. There was no instance reported when the control devices (flares and the engines) were out of operation for periods exceeding one hour. At no time was the collection system not operating for more than 5 days. Surface methane monitoring occurred in September (3<sup>rd</sup> quarter) and November (4<sup>th</sup> quarter) with zero and one exceedance reported respectively. Compliance was restored through remediation activities and confirmed by 10 and 30 day recheck. Gas was never diverted from control device through bypass line, and there was no malfunction that would cause exceedance of applicable emission limitations. A total of twenty-four (24) startup and shutdown events were reported. No malfunction was reported. The shutdown events were attributed to low inlet vacuum, Zone A/B flame failure, Zone A/B low temperature, and low flare temperature. Actions consistent with SSM plan were reportedly taken. The report was received electronically on January 28, 2021.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

The AQCP performed an onsite full compliance evaluation on November 12, 2020. After the review of all the necessary documents, the facility was found in compliance with the applicable air regulations and permit requirements.

**Applicable Standards/Limits:**

**A. Standard for Air Emissions from Municipal Solid Waste Landfills**

**40 CFR 62, Subpart OOO**

**§62.16711 Designated facilities.**

“(a) The designated facility to which this subpart applies is each municipal solid waste landfill in each state, protectorate, and portion of Indian country that meets the conditions of paragraphs (a)(1) and (2) of this section, except for landfills exempted by paragraphs (b) and (c) of this section.

(1) The municipal solid waste landfill commenced construction, reconstruction, or modification on or before July 17, 2014.”

**§62.16712 Compliance schedule and increments of progress.**

“Planning, awarding of contracts, installing, and starting up MSW landfill air emission collection and control equipment that is capable of meeting the emission standards of § 62.16714 must be completed within 30 months after the date an NMOC emission rate report shows NMOC emissions equal or exceed 34 megagrams per year; or within 30 months after the date of the most recent NMOC emission rate report that shows NMOC emissions equal or exceed 34 megagrams per year, if Tier 4 surface emissions monitoring (SEM) shows a surface emission concentration of 500 parts per million methane or greater.”

**§62.16714 Standards for municipal solid waste landfill emissions.**

**Applicability**

These emission guidelines apply to “each owner or operator of an MSW landfill having a design capacity greater than or equal to 2.5 million megagrams by mass and 2.5 million cubic meters by volume must collect and control MSW landfill emissions at each MSW landfill that meets the following conditions:

(1) Waste acceptance date. The landfill has accepted waste at any time since November 8, 1987, or has additional design capacity available for future waste deposition.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(2) Construction commencement date. The landfill commenced construction, reconstruction, or modification on or before July 17, 2014.

(3) NMOC emission rate. The landfill has an NMOC emission rate greater than or equal to 34 megagrams per year or Tier 4 SEM shows a surface emission concentration of 500 parts per million methane or greater.

(4) Closed subcategory. The landfill in the closed landfill subcategory and has an NMOC emission rate greater than or equal to 50 megagrams per year.”  
**[Reference: 40 CFR §62.16714(a)]**

Collection System

The Permittee must install “a gas collection and control system meeting the requirements in paragraphs (b)(1) through (3) and (c) of this section at each MSW landfill meeting the conditions in paragraph (a) of this section.

(1) Collection system. Install and start up a collection and control system that captures the gas generated within the landfill within 30 months after:

(i) The first annual report in which the NMOC emission rate equals or exceeds 34 megagrams per year, unless Tier 2 or Tier 3 sampling demonstrates that the NMOC emission rate is less than 34 megagrams per year, as specified in § 62.16724(d)(4), or

(ii) The first annual report in which the NMOC emission rate equals or exceeds 50 megagrams per year submitted under previously applicable regulations 40 CFR part 60, subpart WWW, 40 CFR part 62, subpart GGG, or a state plan implementing 40 CFR part 60, subpart Cc for a legacy controlled landfill or landfill in the closed landfill subcategory, or

(iii) The most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year based on Tier 2, if the Tier 4 SEM shows a surface methane emission concentration of 500 parts per million methane or greater as specified in § 62.16724 (d)(4)(iii).

(2) Active. An active collection system must:

(i) Be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control system equipment.

(ii) Collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active; or 2 years or more if closed or at final grade.

(iii) Collect gas at a sufficient extraction rate.

(iv) Be designed to minimize off-site migration of subsurface gas.

(3) Passive.....” **[Reference: 40 CFR §62.16714(b)(3)]**

Control System.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

The Permittee must “control the gas collected from within the landfill through the use of control devices meeting the following requirements, except as provided in 40 CFR 60.24.

- (1) A non-enclosed flare designed and operated in accordance with the parameters established in 40 CFR 60.18 except as noted in § 62.16722(d); or
- (2) 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 or less. The reduction efficiency or concentration in parts-per-million by volume must 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 § 62.16718(d). The performance test is not required for boilers and process heaters with design heat input capacities equal to or greater than 44 megawatts that burn landfill gas for compliance with this subpart.
  - (i) If a boiler or process heater is used as the control device, the landfill gas stream must be introduced into the flame zone.
  - (ii) The control device must be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in § 62.16722.
  - (iii) Legacy controlled landfills or landfills in the closed landfill subcategory that have already installed control systems and completed initial or subsequent performance tests may comply with this subpart using the initial or most recent performance test conducted to comply with 40 CFR part 60, subpart WWW; subpart GGG of this part; or a state plan implementing subpart Cc of part 60, is sufficient for compliance with this subpart.” **[Reference: 40 CFR §62.16714(c)]**
- (3) The Permittee must “route the collected gas to a treatment system that processes the collected gas for subsequent sale or beneficial use such as fuel for combustion, production of vehicle fuel, production of high-Btu gas for pipeline injection, or use as a raw material in a chemical manufacturing process. Venting of treated landfill gas to the ambient air is not allowed. If the treated landfill gas cannot be routed for subsequent sale or beneficial use, then the treated landfill gas must be controlled according to either paragraph (c)(1) or (2) of this section. **[Reference: 40 CFR §62.16714(c)(1)]**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (4) All emissions from any atmospheric vent from the gas treatment system are subject to the requirements of paragraph (b) or (c) of this section. For purposes of this subpart, atmospheric vents located on the condensate storage tank are not part of the treatment system and are exempt from the requirements of paragraph (b) or (c) of this section. **[Reference: 40 CFR §62.16714(c)(4)]**

Design Capacity.

“Each owner or operator of an MSW landfill having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume must submit an initial design capacity report to the Administrator as provided in § 62.16724(a). The landfill may calculate design capacity in either megagrams or cubic meters for comparison with the exemption values. Any density conversions must be documented and submitted with the report. Submittal of the initial design capacity report fulfills the requirements of this subpart except as provided in paragraphs (d)(1) and (2) of this section.

(1) ....

(2) When an increase in the maximum design capacity of a landfill with an initial design capacity less than 2.5 million megagrams or 2.5 million cubic meters results in a revised maximum design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, the owner or operator must comply with paragraph (e) of this section.” **[Reference: 40 CFR §62.16714(d)]**

Emissions.

“The owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must either install a collection and control system as provided in paragraphs (b) and (c) of this section or calculate an initial NMOC emission rate for the landfill using the procedures specified in § 62.16718(a). The NMOC emission rate must be recalculated annually, except as provided in § 62.16724(c)(3).

(1) If the calculated NMOC emission rate is less than 34 megagrams per year, the owner or operator must:

(i) Submit an annual NMOC emission rate report according to § 62.16724(c), except as provided in § 62.16724(c)

(3); and

(ii) Recalculate the NMOC emission rate annually using the procedures specified in § 62.16724(a) until such time as the calculated NMOC emission rate is equal to or greater than 34 megagrams per year, or the landfill is closed.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(A) If the calculated NMOC emission rate, upon initial calculation or annual recalculation required in paragraph (e)(1)(ii) of this section, is equal to or greater than 34 megagrams per year, the owner or operator must either: Comply with paragraphs (b) and (c) of this section; calculate NMOC emissions using the next higher tier in § 62.16718; or conduct a surface emission monitoring demonstration using the procedures specified in § 62.16718(a)(6).

(2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either: Submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in § 62.16724(d), except for exemptions allowed under § 62.16711(g)(3); calculate NMOC emissions using a higher tier in § 62.16718; or conduct a surface emission monitoring demonstration using the procedures specified in § 62.16718(a)(6). **[Reference: 40 CFR §62.16714(e)]**

Compliance Demonstration

The Permittee shall use the applicable testing methods and requirements listed in Section 1.2.A. The Permittee should follow the appropriate and applicable monitoring requirements listed in Section 1.3.A. As part of the record-keeping requirements, the Permittee shall follow the applicable recording requirements listed in Section 1.4.A. As part of the reporting requirements, the Permittee shall prepare and submit any of the applicable and appropriate reporting requirements listed Section 1.5.A.

**B. Operational Standards for Collection and Control Systems – [40 CFR §60.34f]**

The Permittee or operator "of an MSW landfill with a gas collection and control system used to comply with the provisions of § 62.16714(b) and (c) must:

- (a) Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for:
  - (1) 5 years or more if active; or
  - (2) 2 years or more if closed or at final grade;
  
- (b) Operate the collection system with negative pressure at each wellhead except under the following conditions:
  - (1) A fire or increased well temperature. The owner or operator must record instances when positive pressure occurs in efforts to avoid a fire.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

These records must be submitted with the annual reports as provided in § 62.16724(h)(1);

(2) Use of a geomembrane or synthetic cover. The owner or operator must develop acceptable pressure limits in the design plan;

(3) A decommissioned well. A well may experience a static positive pressure after shutdown to accommodate for declining flows. All design changes must be approved by the Administrator as specified in § 62.16724(d);

- (c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well. A higher operating value demonstration must be submitted to the Administrator for approval and must include supporting data demonstrating that the elevated parameter neither causes fires nor significantly inhibits anaerobic decomposition by killing methanogens. The demonstration must satisfy both criteria in order to be approved (i.e., neither causing fires nor killing methanogens is acceptable).
- (d) Operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator must conduct surface testing using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in § 62.16720(d). The owner or operator must conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at no more than 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover and all cover penetrations. Thus, the owner or operator must monitor any openings that are within an area of the landfill where waste has been placed and a gas collection system is required. The owner or operator may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan must be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.
- (e) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with § 62.16714(c). In the event the collection or control system is not operating, the gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within 1 hour of the collection or control system not operating. (f)

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

Operate the control system at all times when the collected gas is routed to the system. (g) If monitoring demonstrates that the operational requirements in paragraphs (b), (c), or (d) of this section are not met, corrective action must be taken as specified in § 62.16720(a)(3) and (5) or § 62.16720(c). If corrective actions are taken as specified in § 62.16720, the monitored exceedance is not a violation of the operational requirements in this section." [Reference: 40 CFR §62.16716(a) thru (g)]

Compliance Demonstration

The Permittee shall use the specified testing methods in paragraphs (a)(1) through (6) of this section to determine whether the gas collection system is in compliance with §62.16714(b)(2). [Reference: 40 CFR §62.16714(b)(2)] The Permittee should follow the appropriate monitoring requirements listed in Section 1.3.A. As part of the record-keeping requirements, the Permittee shall follow the applicable record keeping requirements in Section 1.4. A. As part of the reporting requirements, the Permittee shall prepare and submit any of the applicable and appropriate reporting requirements in Section 1.5.A.

**C. Particulate Matter from Materials Handling and Construction.**

"A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer: (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts." [Reference: COMAR 26.11.06.03D]

Compliance Demonstration

The Permittee shall maintain and update the current plan that contains an explanation of reasonable precautions or best management practices (BMPs) that will be used to prevent particulate matter from becoming airborne. The Permittee shall perform a semi-annual inspection of the operation to verify that the reasonable precautions (BMPs) are being implemented. The Permittee shall keep results of the semi-annual inspections for a period of five (5) years and shall maintain the written reasonable precautions (BMPs) at the facility. [Reference: COMAR 26.11.03.06C]

---

**Emission Units: A & B Cont'd**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Area A**

148-acre area of landfill is closed and capped. Area A was active from 1968 to 1992 and contains approximately 7.5 million tons of waste. It incorporates a LFG collection system. LFG from Area A is collected, sent to compressor building for treatment (compression, dehydration, and filtrations, and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.

**Area B**

140-acre area of landfill, which contains eleven planned cells. Landfilling in Area B began in 1992 and is presently ongoing. Waste has been placed in nine cells. The design capacity of the landfill is 8.5 million tons. Area B incorporates a LFG collection system. LFG from Area B is collected, sent to compressor building for treatment (compression, dehydration and filtration), and ultimately to generators and boilers located on-site and at the County Correctional Facility. Excess LFG is routed to a flare station.

**Applicable Standards/Limits:**

Subpart AAAA – National Emission Standard for Hazardous Air Pollutants:  
Municipal Solid Waste Landfills.

**Applicability**

"You are subject to this subpart if you own or operate an MSW landfill that has accepted waste since November 8, 1987, or has additional capacity for waste deposition and meets any one of the three criteria in paragraphs (a)(1) through (3) of this section: (3) Your MSW landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m<sup>3</sup>) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to § 63.1959." [Reference: 40.CFR §63.1935(a)(3)]

"If your landfill is an existing affected source, you must comply with this subpart by January 16, 2004." [Reference: 40 CFR §63.1945(b)]

**Standards**

"(a) Before September 28, 2021, if alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions have already been approved under 40 CFR part 60, subpart WWW; subpart XXX; a federal plan; or an EPA-approved and effective state or tribal plan, these alternatives can be used to comply with this subpart, except that all affected sources must comply with the SSM requirements in subpart A of this part as specified in Table 1 of this subpart and all affected sources must submit

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

compliance reports every 6 months as specified in § 63.1981(h), including information on all deviations that occurred during the 6-month reporting period. Deviations for continuous emission monitors or numerical continuous parameter monitors must be determined using a 3-hour monitoring block average. Beginning no later than September 28, 2021, the collection and control system design plan may include for approval collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions, as provided in § 63.1981(d)(2).” [Reference: 40 CFR §63.1955(a)]

General and Continuing Compliance Requirements

“(a) Except as provided in § 63.1981(d)(2), the specified methods in paragraphs (a)(1) through (5) of this section must be used to determine whether the gas collection system is in compliance with § 63.1959(b)(2)(ii).

(1) For the purposes of calculating the maximum expected gas generation flow rate from the landfill to determine compliance with § 63.1959(b)(2)(ii)(C)(1), either Equation 5 or Equation 6 must be used. The owner or operator may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Administrator. The methane generation rate constant (k) and methane generation potential (Lo) kinetic factors should be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42) or other site-specific values demonstrated to be appropriate and approved by the Administrator. If k has been determined as specified in § 63.1959(a)(4), the value of k determined from the test must be used. A value of no more than 15 years must be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure.”

“(iii) If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, Equation 5 or Equation 6 in paragraphs (a)(1)(i) and (ii) of this section. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using Equation 5 or Equation 6 in paragraph (a)(1)(i) or (ii) of this section or other methods must be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment.”

(2) “For the purposes of determining sufficient density of gas collectors for compliance with § 63.1959(b)(2)(ii)(B)(2), the owner or operator must design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Administrator, capable of controlling and extracting gas

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

from all portions of the landfill sufficient to meet all operational and performance standards.”

- (3) “For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with § 63.1959(b)(2)(ii)(B)(3), the owner or operator must measure gauge pressure in the gas collection header applied to each individual well monthly. Any attempted corrective measure must not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval. If a positive pressure exists, follow the procedures as specified in § 60.755(a)(3), except:

(i) Beginning no later than September 27, 2021, if a positive pressure exists, action must be initiated to correct the exceedance within 5 days, except for the three conditions allowed under § 63.1958(b).

(A) If negative pressure cannot be achieved without excess air infiltration within 15 days of the first measurement of positive pressure, the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after positive pressure was first measured. The owner or operator must keep records according to § 63.1983(e)(3).

(B) If corrective actions cannot be fully implemented within 60 days following the positive pressure measurement for which the root cause analysis was required, the owner or operator must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the positive pressure measurement. The owner or operator must submit the items listed in § 63.1981(h)(7) as part of the next semi-annual report. The owner or operator must keep records according to § 63.1983(e)(4).

(C) If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 63.1981(j). The owner or operator must keep records according to § 63.1983(e)(5).”

(ii) [Reserved]

- (4) “Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with the temperature and nitrogen or oxygen operational standards in introductory paragraph § 63.1958(c), for the purpose of identifying whether excess air infiltration into the landfill is occurring, the

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

owner or operator must follow the procedures as specified in § 60.755(a)(5) of this chapter, except:

(i) Once an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with the operational standard for temperature in § 63.1958(c)(1), the owner or operator must monitor each well monthly for temperature for the purpose of identifying whether excess air infiltration exists. If a well exceeds the operating parameter for temperature as provided in § 63.1958(c)(1), action must be initiated to correct the exceedance within 5 days. Any attempted corrective measure must not cause exceedances of other operational or performance standards.

(A) If a landfill gas temperature less than or equal to 62.8 degrees Celsius (145 degrees Fahrenheit) cannot be achieved within 15 days of the first measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit), the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after a landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit) was first measured. The owner or operator must keep records according to § 63.1983(e)(3).

(B) If corrective actions cannot be fully implemented within 60 days following the temperature measurement for which the root cause analysis was required, the owner or operator must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit). The owner or operator must submit the items listed in § 63.1981(h)(7) as part of the next semi-annual report. The owner or operator must keep records according to § 63.1983(e)(4).

(C) If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 63.1981(h)(7) and (j). The owner or operator must keep records according to § 63.1983(e)(5).

(D) If a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured, according to the procedures in § 63.1961(a)(5)(vi) is greater than or equal to 1,000 ppmv the corrective action(s) for the wellhead temperature standard (62.8 degrees Celsius or 145 degrees Fahrenheit) must be completed within 15 days."

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(5) "An owner or operator seeking to demonstrate compliance with § 63.1959(b)(2)(ii)(B)(4) through the use of a collection system not conforming to the specifications provided in § 63.1962 must provide information satisfactory to the Administrator as specified in § 63.1981(d)(3) demonstrating that off-site migration is being controlled.

(b) For purposes of compliance with § 63.1958(a), each owner or operator of a controlled landfill must place each well or design component as specified in the approved design plan as provided in § 63.1981(d). Each well must be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of:

(1) 5 years or more if active; or

(2) 2 years or more if closed or at final grade.

(c) The following procedures must be used for compliance with the surface methane operational standard as provided in § 63.1958(d)." **[Reference: 40 CFR §63.1960]**

Compliance Demonstration

The Permittee "must submit the reports specified in this section and the reports specified in Table 1 to this subpart. If you have previously submitted a design capacity report, amended design capacity report, initial NMOC emission rate report, initial or revised collection and control system design plan, closure report, equipment removal report, or initial performance test under 40 CFR part 60, subpart WWW; 40 CFR part 60, subpart XXX; or a federal plan or EPA-approved and effective state plan or tribal plan that implements either 40 CFR part 60, subpart Cc or 40 CFR part 60, subpart Cf, then that submission constitutes compliance with the design capacity report in paragraph (a) of this section, the amended design capacity report in paragraph (b) of this section, the initial NMOC emission rate report in paragraph (c) of this section, the initial collection and control system design plan in paragraph (d) of this section, the revised design plan in paragraph (e) of this section, the closure report in paragraph (f) of this section, the equipment removal report in paragraph (g) of this section, and the initial performance test report in paragraph (i) of this section. You do not need to re-submit the report(s). However, you must include a statement certifying prior submission of the respective report(s) and the date of submittal in the first semi-annual report required in this section." **[Reference: 40 CFR §63.1981]**

In addition, "except as provided in § 63.1981(d)(2), each owner or operator of a controlled landfill must keep up-to-date, readily accessible records for the life of

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

the control system equipment of the data listed in paragraphs (b)(1) through (5) of this section as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years. Records of the control device vendor specifications must be maintained until removal.” [Reference: 40.CFR §63.1983(b)]

---

**Emission Unit: F1, F2 & F3 (Flares)**

**MDE Reg. No. (9-0821) for F1 and F2**

One flare station composed of two (2) enclosed ground flares each rated at 45 million Btu per hour used to burn off excess LFG, both installed in October 1995.

**MDE Reg. No. (9-1361) for F3**

One (1) enclosed flare rated at 90 million Btu per hour used to burn off excess LFG, installed in October 2014.

Note: These flares are used to burn off excess LFG.

**Applicable Standards and Limits**

**A. Control of Visible Emissions**

**COMAR 26.11.06.02C(2) – Visible Emission Standards.**

“In Areas III and IV, a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

**COMAR 26.11.06.02A(2) – Exception.**

“The visible emissions standards in C of this regulation do not apply to emissions during start-up and process modification or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

**Compliance Demonstration**

The Permittee shall properly operate and maintain the flare in a manner to minimize visible emissions. The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request. [Reference: COMAR 26.11.03.06C] The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, “Report of Excess Emissions and Deviations.

---

**B. Air Standards**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

"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)." **[Reference: 40 CFR §60.752(b)(2)(iii)B]**

"The control device shall be operated with the parameter ranges established during initial or most recent performance test. The operating parameters to be monitored as specified in 60.756." **[Reference: 40 CFR §60.752(b)(2)(iii)B]**

Compliance Demonstration

"For the performance test required in §60.752(b)(2)(iii)(B), Method 25, 25C, or Method 18 of Appendix A of this part must be used to determine compliance with the 98 weight-percent efficiency or the 20 ppmv outlet concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by §60.752(b)(2)(i)(B). Method 3 or 3A shall be used to determine oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 ppm NMOC as carbon (8 ppm NMOC as hexane), Method 25A should be used in place of Method 25. If using Method 18 of appendix A of this part, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The following equation shall be used to calculate efficiency:

$$\text{Control Efficiency} = (\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / (\text{NMOC}_{\text{in}})$$

where,

NMOC<sub>in</sub> = mass of NMOC entering control device

NMOC<sub>out</sub> = mass of NMOC exiting control device"

**[Reference: 40 CFR §60.754(d)]**

"Each owner or operator seeking to comply with §60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment." **[Reference: 40 CFR §60.756(b)]**

"Except as provided in §60.752(b)(2)(i)(B), each owner or operator of a controlled landfill shall keep up-to-date, readily accessible records for the life of the control equipment of the data listed in paragraphs (b)(1) through (b)(4) of this section as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal." **[Reference: 40 CFR §60.758(b)]**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**C. Operational Standard**

For F1 & F2

The temperature of the flue gas leaving the combustion chamber shall be at least 1400 °F.

The Permittee shall analyze the composition of the landfill gas during each stack emission test. **[Reference: MDE PTC No. 16-9-0821 N]**

Compliance Demonstration

The Permittee shall maintain all temperature monitoring data on site for at least five years and shall make them available to the Department upon request. **[Reference: COMAR 26.11.03.06C]** The Permittee shall submit to the Department the results of the stack emissions tests. These tests shall include a landfill gas analysis and landfill gas flow rate measurements. The Permittee shall maintain all stack tests results on site for at least five years and shall make them available to the Department upon request. **[Reference: MDE PTC No. 16-9-0821 N]**

For F3

The Permittee shall operate the enclosed flare system with the following:

- (a) A temperature (heat sensing) monitoring device, such as an ultraviolet beam sensor or thermocouple, equipped with a continuous recorder and having an accuracy of  $\pm 1$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 0.5^{\circ}\text{C}$ , whichever is greater.
- (b) A gas flow rate measuring device that provides a measurement of gas flow to the flare system. The system shall either: (i) Install, calibrate and maintain a gas flow rate measuring device that shall record the flow rate to the control device at least 15 minutes; or (ii) Secure the bypass line valve in the close position with a car-seal or a lock and key type configuration.

**[Reference: MDE PTC No. 033-2084-9-1361, Part D – Operating Condition D(4)]**

Compliance Demonstration

The Permittee shall perform an initial performance test or compliance determination to determine the operational destruction efficiency or outlet concentration specified: 98 percent NMOC destruction efficiency or reduce the outlet to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen, while the gases are burned through the system. **[Reference: MDE PTC No. 033-2084-9-1361, Condition D(3) & E(1)]** A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the close position and that the gas flow is not diverted through the bypass line. **[Reference: MDE PTC No. 033-2084-9-1361, Part D-Operating Condition D(4)]** The Permittee shall keep records of the monthly visual inspection performed on the seal or closure mechanism to ensure that the valve is maintained in the closed position and the gas flow is not

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

diverted through the bypass line. [Reference: COMAR 26.11.03.06C] The Permittee shall keep up-to-date and readily accessible records for the life of the control equipment the following data: (1) the flare burning temperature with accuracy of  $\pm 1$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 0.5^{\circ}\text{C}$ , whichever is greater; (2) a gas flow rate to or bypass of the flare system. [Reference: MDE PTC No. 033-2084-9-1361, Part E-Testing, Monitoring, Record Keeping and Reporting Condition 2] The Permittee shall report the following to the Department: (1) the average combustion temperature measured at least every 15 minutes and averaged over the same time period of the performance test; (2) the percent reduction of NMOC determined as specified in 40 CFR 60.754(d) achieved by the control device. [Reference: MDE PTC No. 033-2084-9-1361, Part E-Testing, Monitoring, Record Keeping and Reporting Condition 1] The Permittee shall report any instances during which the parameter boundaries established during the most recent performance test are exceeded. The following constitute exceedances that shall be recorded and reported to the Department: For the enclosed flare, all 3-hour periods of operation during which the average combustion temperature was more than 28  $^{\circ}\text{C}$  below the average temperature the most recent performance test at which compliance with the limitation set was determined. The Permittee shall report instances or all periods of operation in which the flame or flare pilot flame serving the enclosed flare was absent. [Reference: MDE PTC No. 033-2084-9-1361, Part E-Testing, Monitoring, Record Keeping and Reporting Condition 4]

---

**Emission Units: B1 & B2 (Boilers)**

**B1 and B2** – Two (2) Weil McLain boilers each rated at 2.049 million Btu per hour heat input and fired on No. 2 fuel oil and biogas from the LPP. These boilers are located on-site at the leachate pre-treatment plant and are used for pre-heating leachate and for heating building space. [4-1621 & 4-1622]

**Applicable Standards and limits:**

**A. Control of Visible Emissions**

**COMAR 26.11.09.05A(2) – Fuel Burning Equipment.**

“(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.

(3) **Exceptions.** Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

(a) The visible emissions are not greater than 40 percent opacity; and

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”

Compliance Demonstration

The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. The Permittee shall maintain operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. **[Reference: COMAR 26.11.03.06C]** The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations.”

**B. Control of Sulfur Oxides**

**COMAR 26.11.09.07A(2) – Sulfur Content Limitations for Fuel.**

“A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV: (b) Distillate fuel oils, 0.3 percent.”

Compliance Demonstration

The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitations on the sulfur content in fuel oil. **[Reference: COMAR 26.11.03.06C]**. The Permittee shall retain fuel supplier certifications stating that the fuel oil is in compliance with this regulation. The Permittee shall report fuel supplier certifications to the Department upon request. **[Reference: COMAR 26.11.09.07C]**

**C. Control of Nitrogen Oxides**

**COMAR 26.11.09.08B(5) – Operator Training.**

- (a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”

**COMAR 26.11.09.08F – Requirements for Space Heaters.**

“(1) A person who owns or operates a space heater as defined in Regulation .01B of this chapter shall:

- (a) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation;
- (b) Develop an operating and maintenance plan to minimize NO<sub>x</sub> emissions based on the recommendations of equipment vendors and other information including the source's operating and maintenance experience;
- (c) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (d) Require installation operators to attend in-State operator training programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
  - (e) Prepare and maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request.
- (2) A person who owns or operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date when the fuel-burning equipment did not qualify and shall meet the applicable fuel-burning equipment RACT requirement in this regulation.”

Compliance Demonstration

The Permittee shall develop and maintain an operating and maintenance plan to minimize NO<sub>x</sub> emissions. [Reference: COMAR 26.11.09.08F(1)(b)] The Permittee shall maintain: (1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan. [Reference: COMAR 26.11.09.08F(1)(c)] (2) Record of training program attendance for each operator. [Reference: COMAR 26.11.09.08F(1)(e)] (3) An operations manual and preventive maintenance plan. [Reference: COMAR 26.11.09.08F(1)(b)] (4) Records of fuel use that demonstrate that the boiler meets the definition of a space heater. [Reference: COMAR 26.11.09.08K(3) and COMAR 26.11.03.06C] The Permittee shall submit: a record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08F(1)(e)]

**D. Operational Standard**

The Permittee shall only burn No. 2 fuel oil, or biogas, unless the Permittee applies for and receives an approval or permit from the Department to burn an alternate fuel. [Reference: COMAR 26.11.02.09A]

Compliance Demonstration

The Permittee shall keep monthly records of the type and quantity of fuel used in the boilers. The Permittee shall report the type and quantity of fuel used in the boilers in the annual emission certification report. [Reference: COMAR 26.11.03.06C]

---

**Emission Units: B1 & B2 (Boilers)      Table 3A**

**B1 and B2 – Two (2) Weil McLain boilers each rated at 2.049 million Btu per hour heat input and fired on No. 2 fuel oil and biogas from the LPP. These boilers are located on-site at the leachate pre-treatment plant and are used for pre-heating leachate and for heating building space. [4-1621 & 4-1622]**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**Applicable Standards and Limits:**

**National Emissions Standards for Hazardous Air Pollutants (NESHAP) – [40 CFR 63, Subpart JJJJJJ]**

**§ 63.11193 Am I subject to this subpart?**

“You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.”

**§63.11194 What is the affected source of this subpart?**

“(a) This subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source of this subpart is the collection of all **existing** industrial, commercial, and institutional boilers within a subcategory, as listed in §63.11200 and defined in §63.11237, located at an area source.”

**§63.11196 What are my compliance dates?**

“(a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.

(1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.

(2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.

(3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.”

**§63.11200 What are the subcategories of boilers?**

The subcategories of boilers, as defined in §63.11237 are:

- (a) .....
- (b) Biomass.”

**§63.11210 What are my initial compliance requirements and by what date must I conduct them?**

- “(a) .....
- (b) .....

**PART 70 OPERATING PERMIT FACT SHEET  
 BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

(c) For **existing** affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2), except as provided in paragraph (j) of this section.”

**Table 2 to Subpart JJJJJJ of Part 63 – Work Practice Standards, Emission Reduction Measures, and Management Practices**

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory . . .	You must meet the following . . .
12. Existing oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr.	Conduct an initial tune-up as specified in § 63.11214, and conduct a tune-up of the boiler every 5 years as specified in § 63.11223.

All reports and notifications required under 40 CFR 63, Subpart JJJJJJ shall be submitted to the Compliance Program of the Department’s Air and Radiation Management Administration.

Compliance Demonstration

The Permittee shall keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR §63.11214 and §63.11223. As part of the testing requirements, the Permittee shall follow the procedures in 40 CFR, §63.11223(a)&(b). As part of the monitoring requirements, the Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **[Reference: 40 CFR §63.11205(a)]** The Permittee shall follow the recordkeeping procedures listed in 40 CFR §63.11225(c). As part of the reporting requirements, the Permittee shall follow the procedures listed in 40 CFR §63.11225(a)&(b).

Emission Unit: LPP

Leachate from Area B is collected in two on-site leachate storage tanks (750,000 gallons each) and is pretreated at the on-site Leachate Pretreatment Plant (LPP). The leachate treatment system consists of pH control, a flocculation basin, primary clarifier, biological treatment, and sludge collection system. Wastewater effluent from the leachate pretreatment plant is discharge into WSSC sanitary

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

sewer system. Volatiles that are emitted from various stages of the LPP are collected and directed to a fume scrubber (FS1) by blowers. [MDE Reg. No. 9-0813]

**Applicable Standards and limits:**

**A. Control of Visible Emissions**

**COMAR 26.11.06.02C(2) – Visible Emission Standards.**

“A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

**Exceptions.** COMAR 26.11.06.02A(2) “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

**Compliance Demonstration**

The Permittee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years. The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, “Report of Excess Emissions and Deviations. [Reference: COMAR 26.11.03.06C]

**B. Control of Particulate Matter**

**COMAR 26.11.06.03B(2)(a) – Particulate Matter from Confined Sources.**

“A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr./SCFD (68.7 mg/dscm).”

**Compliance Demonstration**

The Permittee shall maintain a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of the thermal oxidizer malfunctions and the corrective actions taken to bring into proper operation. [Reference: COMAR 26.11.03.06C]

**C. Operational Standard**

The Permittee shall only burn the gases discharged by the baffled anaerobic reactor either in a flare or one or both of the boilers at the leachate pretreatment plant on site previously permitted by the Department (Permit No, 16-4-1621N and 1622 N]. [Reference: MDE PTC 16-9-0813N, Condition 6]

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

The Permittee shall not treat the leachate unless all the required air pollution control equipments are online and operating properly. [Reference: MDE PTC 16-9-0813N, Condition 7]

Compliance Demonstration

The Permittee shall maintain records, for a period of at least five years, of any malfunctions or incidents where the gases from the anaerobic reactor are not burned in the flare or boilers. The Permittee shall report incidents where the gases from the anaerobic reactor are not burned in the flare or boilers in accordance with COMAR 26.11.01.07 and COMAR 26.11.03.06C(7).

[Reference: COMAR 26.11.03.06C] The Permittee shall keep records of operation on site for at least five years and make these records available to the Department upon request. [Reference: MDE PTC 12-9-0813N, Condition 9]

---

Emission Unit: PP

This is a 4.2 MW electrical energy power facility with four (4) landfill gas LFG) fired internal combustion engine/generators sets. Two of these units can also be operated on propane. Each engine generator is rated at 1,050 kW and has a maximum LFG input rate of 21,960 cubic feet per hour. [MDE PTC - 033-2084-9-1364]

The State's Public Service Commission (PSC) granted a Certificate of Public Convenience and Necessity (CPCN) for the construction of a 4.2 MW generating facility at the Brown Station Road landfill. The CPCN became effective on September 26, 2000. The case number is 8838. The CPCN covers units G1, G2, G3, and G4. The CPCN constitutes a permit to construct (PTC) from the Department. Please refer to Licensing condition # 5, PSC Case No. 8838.

Note: The March 4, 2004 stack test results showed compliance with the NOx emissions Standards. Department required a stack test on at least one of the four engine generators at the facility to determine formaldehyde emissions based on EPA Method 323 (refer to MDE's letter of October 11, 2013). Stack testing performed on January 9, 2014, and report submitted.

NSPS

These engines are not subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines since construction commenced prior to July 11, 2005.

NESHAP

Brown Station Road Sanitary Landfill is not a major source with respect to HAP emissions and the four (4) engines were installed prior to June 12, 2006. These

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

engines are considered existing stationary RICE at an area source of HAP emissions. The compliance date for existing sources is May 3, 2013. The NESHAP requirements of 40 CFR, Part 63, Subpart ZZZZ are included in the Title V – Part 70 Operating Permit for existing non-emergency, non-black start stationary RICE which combusts landfill gas equivalent to 10 percent or more of the gross heat input on an annual basis. These engines operate by burning the collect landfill gas generated onsite. The Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**Applicable Standards and limits:**

**A. Control of Visible Emissions**

**COMAR 26.11.09.05E – Stationary Internal Combustion Engine Powered Equipment.**

- “(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (4) Exceptions.
- (a) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
- (b) Section E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
- (i) Engines that are idled continuously when not in service: 30 minutes;
- (ii) All other engines: 15 minutes.
- (c) Section E(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics.”

**Compliance Demonstration**

The Permittee shall properly operate and maintain the engines in a manner to minimize visible emissions. The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request. [Reference: COMAR 26.11.03.06C]. The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, “Report of Excess Emissions and Deviations.”

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**B. Operational Standard**

1. The Certificate of Public Convenience and Necessity (CPCN) constitutes the air quality permit to construct for the Prince George's County Brown Station Landfill Project. All CPCN requirements, which apply, to the County shall apply to all subsequent owners and/or operators of the facility. **[Reference: PSC Case No. 8838].**

Compliance Demonstration

In the event of any change in control or ownership, the County shall notify the succeeding owner/operator in writing of the requirements imposed by the CPCN. The Permittee shall also send ARMA a copy of the written notification referenced above. **[Reference: PSC Case No. 8838].**

2. The Permittee shall burn only landfill gas (LFG), or propane gas, unless the Permittee applies for and receives an approval or permit from the Department to burn alternative fuels. **[Reference: COMAR 26.11.02.09A and PSC Case No. 8838]**

Compliance Demonstration

The Permittee shall maintain operations logs, which show the amounts of propane and/or landfill gas burned. **[Reference: COMAR 26.11.03.06C]**

3. The Permittee shall ensure that short-term emissions from each engine do not exceed the following rates: NO<sub>x</sub> - 1.99 lbs/hr. **[Reference: PSC Case No. 8838, dated April 22, 2005].**

Compliance Demonstration: Same as 4.

4. The Permittee shall ensure that the net increase of NO<sub>x</sub> emissions due to modifications to the electric generation system do not exceed 25 TPY on a rolling 12-month basis. The combined power output of the four-(4) generator/engine sets shall not exceed 30,656,000 kWh/yr. **[Reference: PSC Case No. 8838].**

**Note:** The above power rating is based on maximum NO<sub>x</sub> emissions from the four engine/generator sets of 29.1 TPY and a 4.2 TPY source-wide NO<sub>x</sub> emission reduction due to the removal of the existing compressors, therefore resulting in a net emissions increase not to exceed 24.9 TPY.

Compliance Demonstration

The Permittee shall submit a test protocol to ARMA for review and approval at least 30 days prior to conducting any compliance stack test. Compliance with stack testing shall be conducted in accordance with ARMA Technical

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

Memorandum <sup>TM</sup> 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991), as amended by Supplement 1 (1 July 1991), 40 CFR 51, 40 CFR 60, subsequent test protocols approved by ARMA. Tests ports shall be located in accordance with TM 91-01 (January 1991), or subsequent alternative measures approved by ARMA. Testing shall be performed when operating at a minimum of 90 percent of the design engine load. If testing cannot be performed at 90 percent of the engine load, then the actual engine load during testing shall become the allowable permitted engine load. The Permittee may be required to conduct additional stack tests at any time in accordance with COMAR 26.11.01.04A. Copies of reports required by change of ownership, stack test protocols, stack testing, and major milestones as described above shall be sent to the Power Plant Research Program at:

Power Plant Assessment Division  
Department of Natural Resources  
Tawes State Office Building, B-3  
580 Taylor Avenue  
Annapolis, Maryland 21401  
[Reference: PSC Case No. 8838]

---

**Emission Unit: GB1 & GB2**

**GB1 and GB2:** Two (2) Weil Mclean boilers each rated at 1.01 million Btu per hour heat input to provide building heating. These boilers operate on LFG with propane as standby fuel, and the LFG consumption is 33.7 scfm each. **[MDE Reg. No. 5-1670]**

40 CFR Part 60 Subpart Dc; Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, is not applicable to these two (2) boilers since they are less than 10 million Btu/hr capacity.

**Applicable Standards and limits:**

**A. Control of Visible Emissions**

**COMAR 26.11.09.05A(2) – Fuel Burning Equipment.**

"(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

**COMAR 26.11.09.05A(3) Exceptions.** Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period."

**Compliance Demonstration**

The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. The Permittee shall maintain operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. **[Reference: COMAR 26.11.03.06C]**. The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations"

**B. Control of Nitrogen Oxides**

**COMAR 26.11.09.08B(5) – Operator Training.**

- (a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department."

**COMAR 26.11.09.08F – Requirements for Space Heaters.**

"(1) A person who owns or operates a space heater as defined in Regulation .01B of this chapter shall:

- (a) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation;
  - (b) Develop an operating and maintenance plan to minimize NO<sub>x</sub> emissions based on the recommendations of equipment vendors and other information including the source's operating and maintenance experience;
  - (c) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;
  - (d) Require installation operators to attend in-State operator training programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
  - (e) Prepare and maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request.
- (2) A person who owns or operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

when the fuel-burning equipment did not qualify, and shall meet the applicable fuel-burning equipment RACT requirement in this regulation.”

Compliance Demonstration

The Permittee shall develop and maintain an operating and maintenance plan to minimize NO<sub>x</sub> emissions. [Reference: COMAR 26.11.09.08F(1)(b)]

The Permittee shall maintain: (1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan. [Reference: COMAR 26.11.09.08F(1)(c)] (2) Record of training program attendance for each operator. [Reference: COMAR 26.11.09.08F(1)(e)] (3) An operations manual and preventive maintenance plan. [Reference: COMAR 26.11.09.08F(1)(b)] (4) Records of fuel use that demonstrate that the boiler meets the definition of a space heater. [Reference: COMAR 26.11.09.08K(3) and COMAR 26.11.03.06C]

The Permittee shall submit: a record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08F(1)(e)]

**C. Operational Standard**

The Permittee shall only burn LFG or propane, unless the Permittee applies for and receives an approval or permit from the Department to burn an alternate fuel. [Reference: COMAR 26.11.02.09A]

Compliance Demonstration

The Permittee shall keep monthly records of type and quantity of fuel used in the boilers. The Permittee shall report the monthly records of the type and quantity of fuel used in the boilers in the annual certification report. [Reference: COMAR 26.11.03.06C].

---

**COMPLIANCE SCHEDULE**

None

**TITLE IV - ACID RAIN**

The Brown Station Road Sanitary Landfill is not subject to the Acid Rain Program.

**TITLE VI - OZONE DEPLETING SUBSTANCES**

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

The Brown Station Road Sanitary Landfill shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

**SECTION 112 (r) - ACCIDENTAL RELEASE**

The Brown Station Road Sanitary Landfill is not subject to the requirements under Section 112(r) - Accidental Release.

**PERMIT SHIELD**

The Brown Station Road Sanitary Landfill did not request a permit shield for its facility operation.

**SECTION V INSIGNIFICANT ACTIVITIES**

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) 4 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

Four (4) emergency generators (EGs): one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, one (1) 30 kW Katolight (Model DFEG5938496 KW) EG located at Scale House, one (1) 350 kW Cummins EG located at Leachate Pretreatment Plant, and one (1) 40 kW Cummins (Model CD03C-1832767 KW) EG located at the Administration Buildings.

The engine is subject to the following requirements:

- (A) COMAR 26.11.09.05E(2) – Emissions During Idle Mode.  
The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (B) COMAR 26.11.09.05E(3) – Emissions During Operating Mode.  
The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (C) Exceptions:

**PART 70 OPERATING PERMIT FACT SHEET  
 BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

- (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
- (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
  - (a) Engines that are idled continuously when not in service: 30 minutes
  - (b) all other engines: 15 minutes.
- (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.

**THESE REQUIREMENTS APPLY TO THE FOLLOWING UNITS:**

one (1) 300 kW Kohler (Model 300REOZJ) diesel-fired EG located at Flare Station, and

one (1) 350 kW Cummins EG located at Leachate Pretreatment Plant.

National Emission Standards for Hazardous Air Pollutants  
**40 CFR, Subpart 63** – Emergency Stationary CI Reciprocating Internal Combustion Engines.

1. The Permittee shall comply with the following requirement, except during periods of startup (Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions):

Excerpts from Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in §§ 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

	<b>You must meet the following requirement, except during periods of startup . . .</b>	<b>During periods of startup you must . . .</b>
<b>For each . . .</b>		

**PART 70 OPERATING PERMIT FACT SHEET  
 BROWN STATION ROAD SANITARY LANDFILL  
 3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
 PART 70 OPERATING PERMIT NO. 24-033-02084**

4. Emergency stationary CI RICE and black start stationary CI RICE. <sup>2</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup>	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

<sup>1</sup> Sources have the option to utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

<sup>2</sup> If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

2. The Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **[Reference: 40 CFR §63.6625(e), §63.6640(a), and Table 6 to 40 CFR 63, Subpart ZZZZ]**
  
3. The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5.

If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [Reference: 40 CFR §63.6625(i)]

- (2)   X   Space heaters utilizing direct heat transfer and used solely for comfort heat (various room throughout the facility);
- (3) Containers, reservoirs, or tanks used exclusively for:
- (a)   ✓   Storage of butane, propane, or liquefied petroleum, or natural gas;
- (b) No.   18   Storage of lubricating oils;
- (c) No.   4   Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
- (d) No.   1   Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
- (4)   ✓   First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

**SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS**

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:
- (A) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

For the Flares Only

- (B) COMAR 26.11.42 – Control of Methane Emissions from Municipal Solid Waste Landfills.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

COMAR 26.11.42.01(A) – Applicability and Exemptions.

“This chapter applies to a person who owns or operates a municipal solid waste (MSW) landfill that has accepted waste after November 8, 1987.”

COMAR 26.11.42.05(B)(2) – Standard and Requirements for Gas Collection and Control Systems. – Requirements for Enclosed Flares.

“(a) An owner or operator of a MSW landfill that routes landfill gas to an enclosed flare shall achieve a methane destruction efficiency of at least 99 percent by weight and meet the following specifications:

(i) The device shall be equipped with automatic dampers, an automatic shutdown device, a flame arrester, and continuous recording temperature sensors; and

(ii) The device shall have a sufficient flow of propane, natural gas, or another fuel source approved by the Department to the pilot light to prevent unburned collected methane from being emitted to the atmosphere during restart and startup.

(b) The owner or operator of a MSW landfill shall install, calibrate, operate and maintain the flare system in accordance with the manufacturer’s specifications and if applicable, within the parameter ranges established in the landfill’s permit to construct issued by the Department.

(c) An owner or operator that used an enclosed flare shall install, calibrate, and maintain a gas flow rate measuring device that either records the flow to the control device at least every 15 minutes or secures the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration.”

(C) COMAR 26.11.42.05(B)(7)(a) thru (k) – Standard and Requirements for Gas Collection and Control Systems. – Performance Test Requirements.

“(a) The owner or operator shall conduct annual performance tests for any gas control device(s) subject to the requirements of §B(2), (3) & (4) of this regulation using the test methods identified in Regulation .11C of this chapter.

(b) An initial performance test shall be conducted within 180 days of start-up of the gas collection and control system.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (c) Following an initial performance test, the owner or operator shall conduct a complete annual performance test no later than 45 days following the 1-year anniversary date of the initial performance test.
  - (d) The owner or operator of an existing gas control device shall demonstrate compliance with this regulation no later than 180 days following the effective date of this regulation in accordance with the test methods and procedures specified in Regulation .11C of this regulation.
  - (e) The owner or operator shall conduct performance tests under conditions specified by the Department based on representative performance of the affected source for the period being tested.
  - (f) Representative conditions shall exclude periods of startup and shutdown unless specified by the Department.
  - (g) The owner or operator may not conduct performance tests during periods of malfunction.
  - (h) The owner or operator shall record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation.
  - (i) The owner or operator shall make available records necessary to determine the conditions of performance tests available upon request by the Department.
  - (j) If a gas control device remains in compliance after three consecutive performance tests, the owner or operator may conduct the performance test every 3 years.
  - (k) Once a gas control device is placed on the 3-year performance test schedule, if a subsequent performance test shows the gas collection and control system is out of compliance with the requirements of this regulation, the performance testing frequency shall return to annual."
- (D) COMAR 26.11.42.09(B)(1) – Monitoring Requirements and Corrective Actions. – Gas Control System Equipment Monitoring.  
"The owner or operator shall monitor the gas control system using the following procedures:

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(1) For enclosed combustors (including enclosed flares), the following equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications:

(a) A temperature monitoring device equipped with a continuous recorder which has an accuracy of plus or minus ( $\pm$ ) 1 percent of the temperature being measured expressed in degrees Celsius or Fahrenheit; and

(b) A device which records the gas flow to the control device(s) and bypass of the control device. The owner or operator shall:

(i) Install, calibrate, and maintain a gas flow rate measuring device that records the flow to the control device at least every 15 minutes;

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; and

(iii) Perform a visual inspection of the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

(c) A temperature monitoring device is not required for boilers and process heaters with a design heat input capacity of 44 megawatts (150 MMBtu/hr) or greater."

(E) COMAR 26.11.42.09(B)(9) – Monitoring Requirements and Corrective Actions. – Gas Control System Equipment Monitoring.

"For a gas treatment system, the following equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications:

(a) A device which records the gas flow to the treatment system and bypass if applicable.

(b) The owner or operator shall:

(i) Install, calibrate, and maintain a gas flow rate measuring device that records the flow to the treatment system at least every 15 minutes;

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; and
- (iii) Perform a visual inspection of the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.”

(F) COMAR 26.11.42.10 – Recordkeeping and Reporting Requirements.

COMAR 26.11.42.10B(1)(a), (b), and (m) – Recordkeeping Requirements.

“An owner or operator of a MSW landfill shall maintain the following records for at least 5 years:

(a) All gas collection system downtime exceeding 5 days, including dates of downtime, individual well shutdown and disconnection times, the reason for the downtime, and any corrective actions conducted in response to the downtime;

(b) All gas control system downtime in excess of 1 hour, the reason for the downtime, and the length of time the gas control system was shut down, and any corrective actions conducted in response to the downtime;”

.....

(m) Records of the gas control system equipment operating parameters specified to be monitored under Regulation .09B of this chapter as well as records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded. The records shall include the following information:

- (i) For enclosed flares, all 3-hour periods of operation during which the average temperature difference was more than 28°C (50° F) below the average combustion temperature during the most recent performance test at which compliance with Regulations .05B(2) and (3) of this chapter was determined;”

COMAR 26.11.42.10C – Reporting Requirements.

COMAR 26.11.42.10C(2) – Equipment Removal Report.

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

“(a) A gas collection and control system equipment removal report shall be submitted to the Department 30 days prior to well capping, removal, or cessation of operation of the gas collection, treatment, or control system equipment.

(b) The report shall contain the following information:

- (i) A copy of the closure notification submitted to the Department in accordance with §C(1) of this regulation;
- (ii) A copy of the initial performance test report or other documentation demonstrating that the gas collection and control system has been installed and operated for a minimum of 15 years, unless the owner or operator can demonstrate that due to declining methane rates the MSW landfill is unable to operate the gas collection and control system for a 15-year period;”

(G) COMAR 26.11.42.10C(7) – Performance Test Report.

“(a) For a control system designed and operated to meet the requirements of this chapter, the owner or operator shall submit a Performance Test Report to the Department that establishes the reduction efficiency or parts per million by volume no later than 180 days after the initial startup of the approved control system using EPA Method 25 or 25C, 40 CFR Part 60, Appendix A.

(b) The owner or operator shall submit any additional performance test reports to the Department within 30 days after the date of completing each performance test, including any associated fuel analyses.”

(c) The performance test report shall include the following information:

- (i) A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, all areas excluded from collection, and the proposed sites for the future collection system expansion;
- (ii) The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

- (iii) The documentation of the presence of asbestos or non-decomposable material for each area from which collection wells have been excluded based on the presence of asbestos or non-decomposable material;
- (iv) The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;
- (v) The process for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
- (vi) The process for controlling off-site migration.”

The Permittee shall follow the reporting procedures listed in COMAR 26.11.42.10 (A) and (A-1). Test results, reports, or other information, unless otherwise specified by the Department shall be submitted to:

Program Manager  
Air Quality Compliance Program  
Maryland Department of the Environment  
1800 Washington Boulevard, Suite 715  
Baltimore, Maryland 21230  
410-537-4225  
Or electronically to:  
MDEAIR.OTHERCOMPLIANCE@maryland.gov  
**[Reference: COMAR 26.11.42.10 (A) and (A-1)]**

(H) COMAR 26.11.42.11(C)(1) – Test Methods and Procedures. – Determination of Control Device Destruction Efficiency.

“The following methods of analysis shall be used to determine the efficiency of the control device in reducing methane:

(1) Enclosed Combustors. One of the following test methods shall be used to determine the efficiency of the control device in reducing methane by at least 99 percent, or in reducing the outlet methane concentration for lean burn engines to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen:

(a) U.S. EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

**PART 70 OPERATING PERMIT FACT SHEET  
BROWN STATION ROAD SANITARY LANDFILL  
3500 BROWN STATION ROAD, UPPER MARLBORO, MD 20774  
PART 70 OPERATING PERMIT NO. 24-033-02084**

(b) U.S. EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon;

(c) U.S. EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer; or

(d) U.S. EPA Reference Method 25C, Determination of Nonmethane Organic Compounds in Landfill Gases.”

**MARYLAND DEPARTMENT OF THE ENVIRONMENT (MDE)  
AIR AND RADIATION ADMINISTRATION (ARA)**

**RESPONSE TO PUBLIC COMMENTS TO THE  
DRAFT PART 70 OPERATING PERMIT RENEWAL FOR  
BROWN STATION ROAD LANDFILL  
3500 BROWN STATION ROAD  
UPPER MARLBORO, MD 20774**

**EIP Comment No. I:**

In their letter, the Environmental Integrity Project (the Commenter) stated that “the draft factsheet does not contain all the information that would be important for EPA and the Public to review.”

More specifically, it was stated that “40 C.F.R. §70.7(a)(5) requires that a permitting authority provide “a statement that sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions).”

In the third paragraph of Comment No. 1, the Commenter referenced a Maryland Department of the Environment (MDE or the Department) Full Compliance report (dated December 8, 2022) which indicates that “the facility is no longer sending LFG to the Correctional Facility and the Power Plants have not been operating since January 2021” and that “flares 1 and 2 are not operating due to need for upgrades in their control systems.” The Commenter is requesting the Department to update the information contained in the factsheet to further explain that Flare 3 is “currently the only control device for collected landfill gas.

**MDE Response – Comment No. I:**

The Department recognizes that there are additional facts and useful information that could be further added to the fact sheet to make it fully informative to the general public with regard to the current operational status of the emission sources at the landfill. The fact sheet has been updated with more current operational facts and the status of the use of the landfill gas, flares 1 and 2, the on-site power plant, and the nearby correctional facility.

**EIP Comment No. II:**

The Commenter stated that “the Permit Terms and Conditions as Drafted Do Not Reflect the Existing Controls Highlighted in the Permit Application Nor the 2022 Full Compliance Evaluation by MDE. Comment II is organized into two subtopics (Comment II A, and II B).

MDE Response – Comment No. II.

The MDE recognizes that there are additional facts and useful information that were documented in the 2022 Full Inspection Compliance Report, which could be used to further enhance the information presented in the fact sheet to make it fully informative regarding the current operational status of the emissions units at the landfill. The Department has updated the fact sheet with additional facts regarding the current operations and the status of the use of the landfill gas, flares 1 and 2, and the power plant located at the nearby correctional facility.

**EIP Comment No. II.A:**

In Comment II A, the Commenter stated that “the draft permit does not include collection system requirements specific to the source.” The Commenter also stated that “language relating to when the collection system should be installed should be removed.” The Commenter asked the Department to revise Condition IV.1.1A “to reflect which requirements actually apply to the collection system as opposed to simply reciting the applicable requirements whole cloth.”

MDE Response – Comment No. II.A.

The installation of the landfill gas control and collection system (GCCS) is an ongoing process at the landfill that follows the use of new waste cells that are filled through the years. The new GCCS sections are added once each cell area is filled with waste that has been buried in place for more than five (5) years. Area A of the landfill is capped and has an active gas collection system. A gas collection system has also been installed in area B, which has been receiving waste since 1992. The installation of the gas collection system in area B was completed and became operational on September 12, 2003. This system continues to expand in various phases as more cells are filled. Phase II of the gas project in area B was completed and became operational on April 7, 2005. Phase III of area B was completed in April 2006. Phase IV was completed in November 2010. In April and May of 2022, four (4) horizontal collectors, HC13 through HC16, and associated piping and appurtenances, were installed in Cell 1 and 11 of area B and connected to the existing LFG collection system. Waste placement in Cell 11 and Cell 1 started on May 2, 2017 and March 6, 2018. Therefore, language related to when collection systems should be installed as needed must remain in the permit.

The addition of GCCS to new areas and cells at the Brown Station Road Sanitary Landfill (the Permittee or the landfill) are properly documented annually in the full compliance inspections and reports by the MDE Air Quality Compliance Program. A description of the current status was added to the fact sheet in response to Comment No. 1 above.

**EIP Comment No. II.B:**

The Commenter stated that “neither the draft permit nor the draft factsheet addresses the portions of the collection and control system that have been shut down since 2021.” The Commenter asked the Department to revise Condition IV.1.1A “to include the requirements applicable to the source.” Furthermore, the Commenter stated that “section (1) under Condition IV.1.1.A. should be removed where no non-enclosed flares are being operated at Brown Station.” The Commenter also stated that the Department should further revise the referred Condition “to include a more complete description of the gas collection and control system because a more complete description would help clarify how the permit conditions apply to Brown Station.”

**MDE Response – Comment No. II.B.**

The Department has updated the fact sheet with additional information that now better explains the current landfill operations, the status of the use of the landfill gas, the status of flares 1 and 2, and the power plant located at the nearby correctional facility.

**EIP Comment No. III**

The Commenter states that “the fugitive dust provisions in the draft permit are inadequate and must be revised.” The Commenter requested that MDE revise Conditions III.1 and IV.1.1.C in the permit pertaining to the control of fugitive dust emissions. The Commenter also requested that the MDE makes the requirement to add the fugitive dust control plan as an attachment to the permit.

EIP Comment No. III includes several related comments as follows:

EIP Comment No. III.B states that Condition III.1 for Plantwide Conditions must be revised because it is too vague to be enforceable.

EIP Comment No. III.C states that Condition 1.1.C for Section IV-Plant Specific Conditions for Areas A and B addressing fugitive dust is inadequate and must be revised.

**MDE Response – Comment No. III**

Conditions III.1 in the permit are plantwide conditions that apply to all Permittees in the State of Maryland. Condition IV.1.1.C applies to potential fugitive particulate matter from materials handling and construction activities at the facility. Although these conditions do not set specific limitations and/or emissions standards, its compliance is enforced using best management practices (BMPs) that are implemented by the Permittee during the daily landfilling operations.

The practices related to the control of fugitive dust at BSRSL are incorporated in Section 7.2 of the “BSRSL Facility Operations and Maintenance Manual,” October 2023 being the most recent issue. The contents and the procedures

described in Section 7.2 of the referenced manual have been reviewed and approved by the MDE Air Quality Compliance Program for many years. The procedures described in Section 7.2 are the generally accepted practices for fugitive dust control at many other landfills throughout the state. The mentioned maintenance and operations manual is a living document which can be edited by the County as needed based on actual operational field data. As such and for practical reasons, the best management practices as well as the BSRSL Operations and Maintenance Manual are maintained at the landfill premises, and its contents are most suitable to reside outside the Title V permit.

The previous and current versions of the Part 70 Operating Permit (Title V) include monitoring and recordkeeping requirements related to control of fugitive dust listed as Condition IV.1.3.C, of the Part 70 Operating Permit (Title V). As stated earlier, as part of the control measures, the Permittee maintains a water irrigation operation through the landfill premises. The water irrigation activities are documented in a "daily logbook" maintained by the Permittee at the premises. The most recent (2022) MDE's Full Compliance Evaluation report contains a copy of the most recent water truck operation logbook for the months of March 2021 through November 2022. The best management practices for fugitive dust are enforced by the MDE's Air Quality Compliance Program during inspections. The MDE has determined that these procedures, including the best management practices for fugitive dust control, are adequate measures to demonstrate compliance with this requirement. It is also important to mention that the Department has not received nuisance complaints regarding fugitive dust leaving the landfill premises and negatively impacting nearby residents.

To better understand the current landfill dust control operations, the Department reached back landfill operators to get clarification on this aspect and the effort taken for dust control. In their response, the Permittee stated that the "Brown Station Road Sanitary Landfill (BSRSL) has two 5K gallon water tankers. Normally, one water tanker is used during normal business hours throughout the day to suppress fugitive dust, when necessary. At least one water tanker is filled at the end of day and parked with a full load. The Landfill Supervisor maintains a running log of all water used to include date and number of load/gallons. This report is provided to the County's contracted engineering firm, SCS Engineers, for appropriate regulatory reporting." These procedures are current and verified by the Air Quality Compliance Program during recurrent onsite inspections.

#### **EIP Comment III.D**

The commenter states that MDE should explain the type of material used as cover. The commenter states that landfill operators have, at times, used materials other than earth or soil as daily cover and that some landfill operators have even used materials like ash byproduct from incinerators. If material other than clean earth is used for daily cover at the landfill, MDE will likely need to establish additional fugitive dust requirements for the control of that material.

MDE should explain in its response to comments the type of material used for daily cover at the landfill.

**MDE Response – Comment No. III.D**

The appropriateness of the use of landfill cover is dictated in both federal and state municipal solid waste landfill regulations, which in this case are under the oversight of the MDE's Land and Materials Administration.

To better understand the current landfill cover operations, the Department reached out to the landfill operator to get clarification on this aspect and materials currently used for landfill cover. In their response, the Permittee stated that the BSRSL only utilizes soil for cover material (daily, intermediate, and final cover), placed in accordance with its Refuse Disposal Permit. Ash is not used as cover material." The use of this material has been approved and included in the current refuse disposal permit for BSRSL.

**EIP Comment III.E**

The commenter stated that "the draft permit must be revised to require the County to operate according to its plan as submitted." The Commenter also stated that "the primary purpose of Title V was to increase public involvement in air quality regulation. The Title V program is meant to "make it easier for the public to learn what requirements are being imposed on sources to facilitate public participation in determining what future requirements to impose." Condition IV.1.3.C. requires that the County operate Brown Station to prevent particulate matter from becoming airborne. The condition further requires that the County implement reasonable precautions and best management practices in its "current plan" to prevent particulate matter from becoming airborne. Thus, the contents of the plan that the County must implement to meet the limit of controlling fugitive dust are applicable requirements."

The Commenter recommended that "MDE should incorporate the plan of best management practices and reasonable precautions to control fugitive dust into the Draft Permit."

**MDE Response – Comment No. III.E**

As stated earlier, the practices related to the control of fugitive dust at the BSRSL are incorporated in Section 7.2, in their Facility Operations and Maintenance Manual, October 2023 being the most recent issue. The manual is a living document for which its contents are most suitable to reside outside the Title V permit. However, for information purposes, the most recent write up in Section 7.2 has been added as Appendix A of this response. Although, the contents laid out in Section 7.2 of the landfill operations and maintenance manual are not singularly depicted as specific permit conditions, its contents are enforceable and inspectable items during compliance inspections.

The fugitive dust control measures that the Permittee follows at the landfill premises have been previously approved by the MDE Air Quality Compliance Program. The fugitive dust control measures that incorporated at the BSRSL are like the generally accepted practice used and implemented at other landfills in Maryland. The Department has also the ability to request modification of the content's layout in the plan, including the need for major revisions if those are deemed necessary. Over the years, the Department has determined that the conditions that are included in Section 7.2 for fugitive dust control are adequate. It is also important to mention that the Department has not received nuisance complaints regarding fugitive dust leaving the landfill premises and negatively impacting nearby residents.

## APPENDIX A

Taken from "BSRSL Facility Operations and Maintenance Manual," October 2023.

### **Section 7.2 DUST Regulatory Requirement: MDE Disposal Permit No. 2020-WMF-058989, Part IV Section I**

Sources for dust on the site include the delivery of cover operations, construction activities, unsurfaced roads, and dry conditions. Dust is controlled at the site through spray application of water. Water is obtained from County fire hydrants or stormwater ponds located onsite. The County does not use chemical dust control methods due to available equipment and water.

Water is applied to road surfaces to minimize dust generated by using the site water truck, which is fitted with a spreader bar for water application. If contractors are onsite performing earthwork, they are responsible for dust control of their activities. The establishment of vegetative cover on slopes of the landfill as soon as possible also reduces the generation of dust.

Commercially available chemical dust suppressants also may be used to reduce dust; however, the specific suppressant must demonstrate that it will not cause air, land, or water pollution, or create public health hazards or nuisances, and must be approved in writing by MDE prior to its use. Dust palliatives are materials which can be applied to prevent dust. These materials work by absorbing and retaining moisture. Magnesium chloride and other salts are examples of these materials. These materials are applied in solution by spraying onto roadways.

Another effective means of controlling dust onsite is the speed limit. Vehicles traveling at slower speeds generally will produce less road wear and resulting dust. Combined with decreasing the fraction of fine or clay particles in road aggregate, dust may be reduced on road surfaces through passive means.