From: Kaldor, Reed A
To: Gent, Philip (ECY)
Cc: Bauder, Lilyann (ECY); Faust, Eric T
Subject: RE: Change to inapplicable requirements for the STGC in the AOP
Date: Monday, November 27, 2017 9:07:55 AM

Phil –

I have discussed this with Eric and it seems that we should include this CFR in the applicable requirements Table as we did for 40 CFR 63 Subpart GGGGG, recognizing that the landfill meets the condition you referenced. Are you OK with this?

Reed
372-1992

From: Gent, Philip (ECY) [mailto:pgen461@ECY.WA.GOV]
Sent: Friday, November 17, 2017 3:07 PM
To: Kaldor, Reed A <Reed_A_Kaldor@rl.gov>
Cc: Bauder, Lilyann (ECY) <liba461@ECY.WA.GOV>
Subject: Change to inapplicable requirements for the STGC in the AOP

Reed,

I have an issue with the Subpart Cf on page 2-18, Table 2-3 of the AOP application. Hanford does have a MSW constructed before 2014, so it does have an affected source. However the citation §60.3f (d)(1), is the term that allows this to be an inapplicable requirement. An issues on your part?

§60.31f Designated facilities.

(a) The designated facility to which these Emission Guidelines apply is each existing MSW landfill for which construction, reconstruction, or modification was commenced on or before July 17, 2014.

(b) Physical or operational changes made to an existing MSW landfill solely to comply with an emission guideline are not considered a modification or reconstruction and would not subject an existing MSW landfill to the requirements of a standard of performance for new MSW landfills.

(c) For purposes of obtaining an operating permit under title V of the Clean Air Act, the owner or operator of an MSW landfill subject to this subpart with a design capacity less than 2.5 million megagrams or 2.5 million cubic meters is not subject to the requirement to obtain an operating permit for the landfill under part 70 or 71 of this chapter, unless the landfill is otherwise subject to either part 70 or 71. For purposes of submitting a timely application for an operating permit under part 70 or 71, the owner or operator of an MSW landfill subject to this subpart with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters on the effective date of EPA approval of the state's program under section 111(d) of the Clean Air Act, and not otherwise subject to either part 70 or 71, becomes subject to the requirements of §70.5(a)(1)(i) or §71.5(a)(1)(i) of this chapter 90 days after the effective date of such section 111(d) program approval, even if the design capacity report is submitted earlier.

(d) When an MSW landfill subject to this subpart is closed as defined in this subpart, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise subject to the requirements of either part 70 or 71 and if either of the following conditions are met:

(1) The landfill was never subject to the requirement to install and operate a gas collection and control system under

§60.33f; or

40 CFR 60 Subpart Cf, “Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills	The MSW on the Hanford Site meets the conditions of §60.3f (d)(1)