

SPECIAL SESSION – MONDAY, OCTOBER 4, 2011 – 12:00 PM – 2 PM

APPLICABILITY OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S GREENHOUSE GAS RULES TO LANDFILLS

Open to all Global Waste Management Symposium attendees, this session provides a forum on recently promulgated rules by the U.S. Environmental Protection Agency (EPA) on greenhouse gas (GHG) emissions as applied to municipal solid waste (MSW) landfills. The discussion is not based on peer-reviewed manuscripts as are the other symposium sessions and posters, but is designed to share information on compliance and permitting.

On 3 June 2010, EPA published the Prevention of Significant Deterioration (PSD) and Title V Greenhouse Gas Tailoring Rule that was the first U.S. federal rule to impose permitting and potential control requirements for GHG emissions at stationary sources (e.g., MSW landfills). The Tailoring Rule requires certain PSD major, new, or modified GHG sources to determine and implement Best Available Control Technology (BACT) for GHG emissions. The implementation of BACT for GHGs through PSD air permitting, the inclusion of GHG emissions and related operating permits, or regulatory requirements in Title V air permits applications will occur in three stages beginning on January 2, 2011.

The Tailoring Rule significantly impacts municipal solid waste (MSW) landfills in the United States. Many landfills will be subject to the PSD program for the first time. There is very little precedent for addressing GHG emissions in any Clean Air Act permit and EPA has not yet issued guidance.

On 20 July 2010, the solid waste management industry met with EPA to present initial recommendations on determining GHG emission PSD applicability and BACT for landfills to assist EPA in developing guidance for regulatory agencies. The specific issues discussed included:

- Determining the landfill's Potential to Emit (PTE), including the impact of fugitive and biogenic emissions;
- Establishing BACT for GHG emissions for landfills; and
- Competing BACT and Lowest Achievable Emission Rate (LAER) for multiple pollutants and common controls.

Speakers at this special session will offer an industry interpretation of PSD and Title V applicability for GHG emissions, including PTE calculations. An overview will be provided on the existing dialogue with EPA regarding guidance and interpretations. Attendees are encouraged to engage in a dialogue on the approaches.