

## **Closed landfill requirements**

Definition: a landfill in which solid waste is no longer being placed, and in which no additional solid wastes will be placed without first filing a notification of modification as prescribed under 60.7(a)(4). Once a notification of modification has been filed, and additional solid waste is placed in the landfill, the landfill is no longer closed. (Subpart WWW, 60.751)

EPA estimates that a landfill will continue to have emissions for 10 -20 years after the landfill has been closed.

### **Air Construction permit requirements**

None for the landfill itself. Permits are required for any other equipment that is still in operation at the facility unless exempt. If a construction permit has been issued, it is retained because the landfill is still emitting NMOC.

### **New Source Performance Standards (NSPS): Subpart WWW and Cc requirements**

1. NSPS WWW would apply to a closed landfill that had commenced construction or modification after May 30, 1991. The standard would require:
  - a. Submittal of a design capacity report. For a closed landfill this would be the amount of in-place waste. For small (i.e capacity less than 2.5 million Mg or 2.5 million m<sup>3</sup>) closed landfills this would be the only requirement.
  - b. For landfills with a capacity of greater than 2.5 million Mg and 2.5 million m<sup>3</sup> (large landfill), the submittal of an initial or periodic reports of annual NMOC emissions, following the Tier procedures in 60.754. This could require a closed landfill to perform Tier 2 or Tier 3 testing if NMOC emissions are estimated by Tier 1 to be greater than 50 Mg/yr.
  - c. If the uncontrolled NMOC emissions from a large closed landfill are less than 50 megagrams, the landfill can stop calculating annual NMOC emission rates.
  - d. If the NMOC emissions from a large landfill are greater than 50 Mg of NMOC, the landfill would be required to meet the control system requirements.
  - e. For a large closed landfill that either has a control system or that is required to have a control system, the control system can be removed provided that 3 conditions have been met:
    - i. The landfill meets the definition of a closed landfill and a closure report has been submitted to DNR, Air Quality Bureau.
    - ii. The collection and control system have been in operation for at least 15 years.
    - iii. The NMOC gas generation rate from the landfill is less than 50 Mg/yr. (Three tests are required in the same year. The tests must be at least 90 days apart, but not farther apart than 180 days. See 60.752(b)(v))
  - f. Large landfills with control equipment must submit a landfill closure report. This report should be submitted within 30 days of the cessation of waste acceptance. **(It would not be a bad idea for all landfills to submit a landfill closure report when they are closed. This report should be submitted to the Compliance Section of the Air Quality Bureau.)**



2. Closed landfills may also be subject to EPA’s Mandatory Reporting Rule for Greenhouse Gases. This rule applies to closed landfills that emit more than 25,000 metric tons per year of CO<sub>2</sub>e emissions. Owners of a closed landfill should go to <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html> for information and reporting tools for this rule. For this rule, greenhouse gas emissions are calculated using formulas in the rule (40 CFR 98.343) and not LandGEM.