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**From:** Kavanaugh Vetort, Diane (DEQ)  
**Sent:** Monday, May 15, 2017 1:25 PM  
**To:** Whitlow, Alexander (DEQ)  
**Cc:** Bean, Lawrence (DEQ); Miller, Scott (DEQ)  
**Subject:** FW: Riser letter  
**Attachments:** Leachate Risers R4 letter.PDF

Hi Alex,

This was just sent to me from Dave (LF workgroup) when I asked him for information he had about Leachate Risers, connection to GCCS, and NSPS required monitoring. We have had these requests historically.

For AHLF in the recent letter you reviewed (and I am drafting our response to) they asked for blanket general approval to connect/disconnect these and not have to meet Oxygen requirements. I remember for AHLF some of these were hooked up to the GCCS due to the odor situation last year. As you know they have odors and have had surface monitoring > 500 ppm in many areas. This is what AHLF wrote in recent request:

#### **Leachate System**

The leachate system is designed to remove liquid from the landfill. Occasionally, landfill gas will migrate to the leachate collection system. In order to control odors, the facility has occasionally applied a small vacuum to certain sections of the leachate system. Because the leachate lines are not intended as a primary landfill gas conveyance system, it is difficult to demonstrate compliance with NSPS oxygen concentration limits. The leachate system is not installed in the waste mass and therefore does not pose a danger to the methanogens, or to causing a fire.

In each of the Gas Collection and Control System Plans that have been submitted to the MDEQ, any connection to the leachate system has been exempt from NSPS rules. As such, the facility would like to maintain this exemption status for these wells.

I was going to reply no, they "ARE SUBJECT to NSPS" if hooked up to the GCCS but can get HOV O2 approvals. I think I will attach & reference this EPA determination to our reply. What we need to know is whether the Leachate Riser(s) are sealed, and whether there are surface hits or odor issues in the immediate/general area. She says they are NOT within the waste boundary. Do you agree with this approach? And perhaps you know about the "seals" for AHLF?

Thanks for your help and let me know what you think,  
Diane

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**From:** Morgan, Dave (DEQ)  
**Sent:** Monday, May 15, 2017 1:07 PM  
**To:** Kavanaugh Vetort, Diane (DEQ)  
**Subject:** Riser letter

Do you have this?