

PPC 9487.1986(03)

GASEOUS EMISSIONS FROM LANDFILLS

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAR 6 1986

Mr. H. Lanier Hickman, Jr.
Executive Director
Governmental Refuse Collection
and Disposal Association
P.O. Box 7219
Silver Spring, Maryland 20910

Dear Mr. Hickman:

This is in reply to your letter to me dated December 5, 1985, in which you requested a clarification of how we intend to regulate gaseous emissions from landfills. In particular, you asked us to consider regulating gaseous emissions from hazardous and non-hazardous waste landfills through the Clean Air Act (CAA) rather than the Resource Conservation and Recovery Act (RCRA).

As we stated in the recently promulgated regulations on the burning and blending of hazardous waste (40 CFR Section 266.30), we believe it is clear that the U.S. Environmental Protection Agency (EPA) has the authority under both Sections 3004(n) and 4004(a) of RCRA, as well as the CAA, to regulate gaseous emissions from hazardous and non-hazardous waste landfills. The lead EPA office for developing air emission standards is the Office of Air Quality Planning and Standards (OAQPS). Because OAQPS is only in the early stages of development of policies and rules pertaining to gaseous emissions from hazardous waste land disposal facilities, it is too early to provide you with anything definitive on this subject at this time. In addition, no decisions have been made regarding any revisions to the landfill gas provisions of the "Criteria for Classification of Solid Waste Disposal Facilities and Practices" (40 CFR Part 257). We will be developing regulatory options for the Criteria revisions during the next several months.

Because the GRCDA Landfill Gas Committee is already working with the EPA Subtitle D program on similar issues, it may be appropriate to discuss this issue at the meeting planned for March 17, 1986, in Newport Beach, California. I have asked Allen Geswein of my staff to work with OAQPS to put this issue on the agenda for this meeting.

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I hope that this information is helpful to you and expect that through a coordinated effort we can develop an appropriate approach for dealing with gaseous emissions from non-hazardous waste land disposal facilities. If you have any specific questions on the development of the air emission standards for hazardous waste land disposal facilities, please contact Susan Thorneloe or Randy McDonald of OAQPS. Both can be reached at (919) 541-5671. Or, contact James Berlow of OSW at (202) 382-7917.

Sincerely yours,

Marcia E. Williams
Director
Office of Solid Waste

cc: Susan Thorneloe (OAQPS)
Randy McDonald (OAQPS)

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