



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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March 26, 2009

Attn: Abbie Webb
Chemung Landfill, LLC
P.O. Box 2178
Elmira, NY 14902

Re: 310 CMR 7.00 Appendix B(7)
Transmittal # X224665 and X224666
Approval of BWP AQ 27 and
AQ 28 Applications
Certification and Verification of GHG Credits at
Chemung Landfill, LLC in Elmira, NY

Dear Ms. Webb:

The Massachusetts Department of Environmental Protection hereby approves your Application for Certification of GHG (Greenhouse Gas) Credits (BWP AQ27), dated October 7, 2008. The Department also approves your Application for Verification of GHG Credits (BWP AQ 28), dated October 7, 2008. In accordance with the requirements of 310 CMR 7.00: Appendix B(7)(f), the Department conducted a 30-day public comment period on the proposed approval. The public comment period ended on March 13, 2009. No public comments were received.

The approval of your Application for Certification of GHG Credits (BWP AQ 27), combined with the approval of your Application for Verification of GHG Credits (BWP AQ 28), creates verified GHG Credits for emission reductions that occurred between August 1, 2007 and July 16, 2008 at Chemung County Landfill in Elmira, NY. These credits have been deposited into MA GHG Credit account MAGHG-N-10009; the GHG Credit Account Representative for this account is Timothy Cretney. Verified GHG Credits from this project can only be used by affected facilities for compliance with the CO₂ emissions standards of 310 CMR 7.29.

Included as part of this approval of your applications for certification and verification of GHG Credits are the following:

- (1) A description of your project.
- (2) A table showing the number of GHG Credits proposed for certification and verification.
- (3) A list of relevant determinations that the Department has made in accordance with the requirements of 310 CMR 7.00: Appendix B(7).
- (4) An explanation of how the number of GHG Credits proposed for certification and verification was calculated.

Note that your applications are also incorporated, by reference, into this approval.

(1) Description of the Project

As described in the application,

The Project consists of the voluntary operation of a methane destruction system at the Chemung County Landfill, near Elmira, New York. The Landfill is divided into three separate areas: a closed C&D landfill, an active C&D Landfill, and an active Subtitle D landfill. The collection and destruction system consists of vertical and horizontal gas extraction wells, a landfill gas header and collection system, and a 750 scfm (capacity) LFG flare.

(2) Table showing the number of GHG Credits

	Time period	Number of Credits
Certified GHG Credits (Proposed)	August 1, 2007 through July 16, 2008	13,998
Verified GHG Credits (Proposed)	August 1, 2007 through July 16, 2008	13,998

(3) A list of relevant determinations that the Department has made in accordance with the requirements of 310 CMR 7.00: Appendix B(7). (Defined terms and language that is directly excerpted from regulations appear in italics.)

The Department has made the following determinations:

- The emission reductions are *Real*, in that there have been actual reductions in emissions of methane, a greenhouse gas, from the Chemung Landfill as a result of the project. Methane has been destroyed through combustion in a flare.
- The emission reductions are *Additional*, in that, according to the applicant, this project is not required by federal, state, or local law or regulation. The application states “The facility is not subject to the requirements of the federal New Source Performance Standards (NSPS) for municipal solid waste landfills.” The application continues, “The Chemung County Landfill operates under the New York State Department of Conservation (NYSDEC) Part 360 permit #8-0728-0004/00013-0. The revision issued February 23, 1996 was updated in a subsequent revision issued February 2, 2006. Neither version of the operating permit requires landfill gas collection or destruction.” There is no legal requirement to destroy the methane gas that has been destroyed by the flare described in the application. The application states that “because neither state nor federal regulations require the installation and operation of a landfill gas destruction system at the Chemung County Landfill, the flare was installed and is being operated voluntarily.”
- The emission reductions are *Verifiable*, in that emission reductions have been calculated based on a gas flow meter and totalizer at the flare. Samples were collected and analyzed for methane content at least once each month.

- The emission reductions are *Permanent*, in that methane has been destroyed in the combustion process.
- The emission reductions are *Enforceable*, in that, pursuant to 310 CMR 7.00: Appendix B(7)(g)8., violations of the requirements of 310 CMR 7.00: Appendix B(7) may be enforced against any person who applied for certification or verification of GHG Credits, an affected facility that purchases GHG Credits created by this project, or any combination thereof.
- The project commenced *on or after January 1, 2006*, in accordance with 310 CMR 7.00: Appendix B(7)(d) 9., in that the project commenced operation on August 1, 2007.
- The project is expected to *generate an annual average over the period applied for of 5,000 or more tons CO_{2e}*, in accordance with 310 CMR 7.00: Appendix B(7)(e)3., in that the project is expected to generate approximately 13,998 tons of CO_{2e} emission reductions over a period of less than one year.
- The application includes *a proposed method for determining, monitoring and assuring compliance*, in accordance with 310 CMR 7.00: Appendix B(7)(e)4.b., in that data showing direct measurements of landfill gas flow and periodic sampling of methane content have been included with the application.
- The applicant has specified *the best management practice used to determine an emissions baseline*, in accordance with 310 CMR 7.00: Appendix B(7)(e)4.d., in that the application includes the following explanation: “Installation and operation of landfill gas destruction systems is not common practice for small landfills in New York State. . . Because LFG destruction is not required nor is it common practice at similar landfills, the BMP scenario at the Chemung County Landfill would be to passively vent landfill gas to the atmosphere, thereby achieving no greenhouse gas reductions.” The application also lists several landfills in New York State that do not employ active landfill gas collection and destruction systems.
- The project does not present any potential project leakage.

(4) Explanation of how the number of GHG Credits for certification and verification was calculated

The number of GHG Credits was calculated using the following equation:

$$\text{GHG Credits} = N_{\text{baseline}} - N_{\text{project}}$$

Where N_{baseline} = the number of tons of CO_{2e} emitted without the project, calculated thus:

$$N_{\text{baseline}} = N_{\text{CH}_4(\text{baseline})} \times 25 \times 0.90 \times 0.98$$

Where:

$N_{\text{CH}_4(\text{baseline})}$ = the number of tons of methane determined to have entered the flare, calculated thus:

$$N_{\text{CH}_4(\text{baseline})} = V \times 0.245 \times 0.80 \times 0.00002123$$

Where:

V = the total number of cubic feet of landfill gas that entered the flare during the verification period, as measured by a gas flow meter;

0.245 = an estimate of the average methane content of the landfill gas that entered the flare, expressed as a fraction by volume. 0.245 is the average reported

methane content from periodic measurements that were carried out at least monthly at the Chemung County Landfill.

0.80 = 20% discount factor of average methane content of the landfill gas as proposed by the applicant. The discount is based on the California Climate Action Registry Landfill Project Reporting Protocol (Version 1.0) Pages 19-20. The reporting protocol states, "For qualifying projects that become operational between January 1, 2001 and January 1, 2008, the use of monthly methane concentration measurements using a calibrated portable gas analyzer is acceptable... In the case where monthly methane concentrations are used, project developers must account for the uncertainty associated with these measurements by applying a 20% discount factor to the total quantity of methane collected and combusted."

0.00002123 = the number of tons of methane that is equal to one cubic foot of methane.

And,

25 = the global warming potential of methane, as published by the Intergovernmental Panel on Climate Change (IPCC) at the time of submittal of the certification application.

0.90 = factor representing the estimated fraction of the methane that would not have eventually oxidized to CO₂ without the project. Methane that would eventually have oxidized to CO₂ is not counted as methane emissions for the purpose of determining the project baseline, because it would have been destroyed anyway. This factor is also included in the landfill gas section of the Massachusetts CO₂ Budget Trading Program regulations.

0.98 = factor representing the estimated combustion efficiency of the methane destruction technology. Methane that passes through the flare without being destroyed is not counted toward the project baseline, because the project will have no effect on these emissions. This factor is also included in the landfill gas section of the Massachusetts CO₂ Budget Trading Program regulations.

And,

N_{project} = the number of tons of CO_{2e} emitted with the project, calculated thus:

$$N_{\text{project}} = N_{\text{CO2}(\text{project})}$$

$N_{\text{CO2}(\text{project})}$ = the number of tons of carbon dioxide created through the combustion of methane, calculated thus:

$$N_{\text{CO2}(\text{project})} = N_{\text{CH4}(\text{baseline})} \times 0.90 \times 0.98 \times 2.75$$

Where:

0.90 = factor representing the estimated fraction of the methane that would not have eventually oxidized to CO₂ without the project, as described above.

0.98 = factor representing the estimated combustion efficiency of the methane destruction technology, as described above.

2.75 = the number of tons of carbon dioxide created for each ton of methane that is combusted. 2.75 is the ratio of the molecular mass of carbon dioxide to the molecular mass of methane.

Data and calculations for this application are summarized in the following table:

	Certification (AQ27)	Verification (AQ 28)
V	171,414,984	171,414,984
$N_{CH4(\text{baseline})}$	713	713
$N_{CO2(\text{project})}$	1,730	1,730
N_{baseline}	15,728	15,728
N_{project}	1,730	1,730
GHG Credits	13,998	13,998

Should you have any questions concerning this APPROVAL, please contact Stacy DeGabriele at stacy.h.degabriele@state.ma.us or (617) 292-5864.

Very truly yours,

Nancy L. Seidman
Deputy Assistant Commissioner
Climate Strategies
Bureau of Waste Prevention

cc: William Lamkin, DEP, BWP, NERO
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