



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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Certified Mail Number: 7015 0640 0005 7966 4538, return receipt requested.

Mr. David Moreira
Senior District Manager
Waste Management of Massachusetts, Inc.
4 Liberty Lane West
Hampton, New Hampshire 03842

Re: BAW – Springfield
Regulation 310 CMR 7.02
Transmittal No.: X269117
Facility ID No.: 39755
Application No.: WE-16-003
Cottage Street Landfill

CONDITIONAL APPROVAL

Dear Mr. Moreira:

The Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, Western Regional Office has completed its review of Waste Management of Massachusetts, Inc.'s (WMMA's) Limited Plan Application ("LPA") dated January 14, 2016. The LPA is for the proposed modification of existing permit requirements for the operational frequency of the landfill gas flare and testing frequency of the landfill gas contents prior to flaring, at the Cottage Street Landfill, Cottage Street, Springfield, Massachusetts.

The application was submitted to address the condition of reduced gas production at the landfill since closure and continuous operation of current collection and flare system.

This Limited Plan Approval applies to the reduced testing frequency requirements for methane and hydrogen sulfide and the institution of intermittent operation of the flare system. The modifications approved herein, shall supersede only those operational and testing provisions found in MassDEP Approval #1-P-08-021, which are relative to those stated above. No other changes to operational, testing, recordkeeping or reporting requirements shall be permitted.

This application was submitted in accordance with 310 CMR 7.02(4) of the Air Pollution Control Regulations ("Regulations"), 310 CMR 7.00, as adopted pursuant to M.G.L. c.111, Sections 142A-142O and Chapter 21C, Sections 4 and 6. The MassDEP's review has been limited to air pollution regulation compliance and does not relieve you of the obligation to comply with other permitting requirements including those in 1-P-08-021. The application was prepared and submitted by SCS Engineers, PC.

MassDEP finds the application to be administratively and technically complete.

CURRENT OPERATION

WMMA operates an enclosed flare as the primary control device and the utility flare as a backup control device when landfill gas quantity and methane content are within the enclosed flare's operable range (below 6.1 MMBtu/hr using the current flow and methane concentration). In the event the landfill gas quantity and methane content reaches the enclosed flare's operable range, the enclosed flare shall be used as the primary control device, with the utility flare as backup. This procedure requires frequent monitoring of the landfill gas prior to entering the flare.

CHANGES TO OPERATIONS

1. The Applicant requests changes to testing frequency of certain LFG components that are described in Paragraphs 27 and 29 of the existing Approval.
2. Due to reduced gas production from the landfill, current operational parameters are becoming difficult to meet, resulting in this request to modify the existing Approval, MassDEP file number 1-P-08-021.
3. Paragraphs 27 and 29 of the existing Approval, require testing of the landfill gas ("LFG") for methane and hydrogen sulfide, respectively, three (3) times per week. The Applicant requests that this testing be reduced to one (1) test per week for each of the landfill gas components listed above. The location of the tests shall remain unchanged, with testing of methane content at the flare and of hydrogen sulfide ("H₂S") at the inlet and outlet of the H₂S control system blower.
4. Flare operation shall be reduced resulting from the reduction in the operation of the LFG collection system, a minimum of five (5) days per week. The flares will continue to operate continuously when LFG is routed to the flare system in accordance with Paragraph 16 of the existing Approval.

PROHIBITIONS

1. **ALL OTHER CONDITIONS LISTED IN CONDITIONAL APPROVAL 1-P-08-021 SHALL REMAIN IN FORCE.**
2. **NO CHANGES TO OTHER MONITORING PARAMETERS FOR OTHER POLLUTANTS, MONITORING PROCEDURES, TESTING PROCEDURES, FREQUENCIES OR METHODS, OPERATIONAL PROCESSES, PROCEDURES OR METHODS, REPORTING AND RECORDKEEPING.**

GENERAL CONDITIONS

1. This approval does not negate the responsibility of the facility to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this Approval imply compliance with this or any other applicable federal, state, or local regulations now or in the future.
2. This approval may be suspended, modified, or revoked by the MassDEP if, at any time, the MassDEP determines that any condition or part of this Approval is being violated.
3. The MassDEP's Solid Waste Section Chief or assigned staff person at this office must be notified by telephone, or fax within 24 hours, and with written notification within 10 days, after the occurrence of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment which result in an excess emission to the air and/or a condition of air pollution as a result of changes allowed by the Approval.

APPEAL RIGHTS

This Conditional Approval is an action of the Department. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date you received this document.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request and the relief sought. Additionally, the request must state why the Final Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P. O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file,

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together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

If there are any questions or comments regarding this Conditional Approval, please contact Bob Shultz of my staff at (413) 755-2210.

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Date: February 22, 2016

Marc Simpson
Permit Section Chief
Bureau of Air and Waste
Western Region

ecc: Dan Hall, Peter Czapienski DEP/WERO
Yi Tian, Marc Wolman DEP/ Boston