



APTIM
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March 27, 2019

Ms. Katherine McIlroy
Project Analyst/Manager
Northeast Maryland Waste Disposal Authority
100 South Charles Street
Tower II – Suite 402
Baltimore, MD 21201

***Gude Landfill
Rockville, Maryland
2018 Annual Emissions Certification Report***

Dear Ms. McIlroy:

Aptim Environmental and Infrastructure, LLC (APTIM) is submitting one copy of the 2018 Annual Emissions Certification Report for the Gude Landfill Gas to Energy Facility in Rockville, Maryland, in accordance with Permit to Operate (PTO) 031-02253. Two copies of the report must be submitted to the MDE offices by April 1, 2019, addressed to:

Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard Suite 715
Baltimore, MD 21230-1720
Attn: Laramie Daniel, Compliance Program

The Responsible Official for the site must complete and submit the Certification of Truth, Accuracy, and Completeness with the report. In addition, a statement should be included certifying that the site is in compliance with the air toxic regulations, and there have been no changes in the air toxic assessment during the 2018 calendar year.

Should you have any questions and/or comments, please do not hesitate to contact the undersigned at 609-588-6398.

Respectfully Submitted,

Aptim Environmental & Infrastructure, LLC

A handwritten signature in black ink, appearing to read "John V. Esmet".

John V. Esmet
Project Manager

Attachment

MARYLAND DEPARTMENT OF THE ENVIRONMENT
 1800 Washington Boulevard, Suite 715 • Baltimore Maryland 21230-1720
 410-537-3000 • 1-800-633-6101 • <http://www.mde.state.md.us>
 Air and Radiation Management Administration
 Air Quality Compliance Program
 410-537-3220

FORM 1:

**GENERAL FACILITY INFORMATION
 EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2018

A. FACILITY IDENTIFICATION				Do Not Write in This Space	
Facility Name <i>Gude Landfill Gas to Energy Facility</i>				Date Received Regional	
Address <i>600 E. Gude Drive</i>				Date Received State	
City <i>Rockville</i> County <i>Montgomery</i> Zip Code <i>20850</i>				AIRS Code	
B. Briefly describe the major function of the facility				FINDS Code	
<i>Landfill Gas To Energy</i>				SIC Code	
				Facility Number:	
				TEMPO ID:	
C. SEASONAL PRODUCTION (% if applicable)				Reviewed by:	
<u>Winter (Dec.-Feb.)</u>	<u>Spring (Mar - May)</u>	<u>Summer (Jun - Aug)</u>	<u>Fall (Sept - Nov)</u>		
<u>25%</u>	<u>25%</u>	<u>25%</u>	<u>25%</u>	Name _____ Date _____	
D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.					
<i>Small variation due to changes in operation and gas collection</i>					
E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)					
Control Device		Capture Efficiency		Removal Efficiency	
<i>Landfill Gas Collection Flare System</i>		<i>N/A</i>		<i>98.0% (Permit)</i>	

I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of 17 pages (including attachments), and certify that the information is correct to the best of my knowledge.

CHRISTOPHER SKAGGS

EXECUTIVE DIRECTOR

3/27/19

Name (Print/Type)

Title

Date

Christopher Skaggs
 Signature

410-333-2730

Telephone

FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: _____

Facility Name: _____ Facility ID: _____ Pollutant: _____

Equipment Description/ Registration No.	SCC Number	Fuel	Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule		Emissions Methods	
			Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start		End
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FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: _____

Facility Name: _____ Facility ID: _____ Pollutant: _____

Equipment Description/ Registration No.	SCC Number	Fuel	Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule		Emissions Methods	
			Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start		End
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FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: _____

Facility Name: _____ Facility ID: _____ Pollutant: _____

Equipment Description/ Registration No.	SCC Number	Fuel	Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule		Emissions Methods	
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FORM 5:

BILLABLE TOXIC AIR POLLUTANTS

Calendar Year: _____

Emissions Certification Report

Facility Name: _____ Facility ID#: _____

Chemical Name	CAS Number		Actual Emissions			Estimation Method
			Tons/year	Lbs/day	Lbs/hr	
carbon disulfide	75-15-0	S				
		F				
carbonyl sulfide	463-58-1	S				
		F				
chlorine	7782-50-5	S				
		F				
cyanide compounds	57-12-5	S				
		F				
hydrochloric acid	7647-01-0	S				
		F				
hydrogen fluoride	7664-39-3	S				
		F				
methyl chloroform	71-55-6	S				
		F				
methylene chloride	75-09-2	S				
		F				
perchloroethylene	127-18-4	S				
		F				
phosphine	7803-51-2	S				
		F				
titanium tetrachloride	7550-45-0	S				
		F				
TOTALS						

Emission Estimation Method

- A1-U.S. EPA Reference Method
- A2-Other Particulate Sampling Train
- A3-Liquid Absorption Technique
- A4-Solid Absorption Technique
- A5-Freezing Out Technique
- A9-Other, Specify

- C1-User calculated based on source test or other measurement
- C2-User calculated based on material balance using engineering knowledge of the process
- C3-User calculated based on AP-42
- C4-User calculated by engineering judgment
- C5-User calculated based on a State or local agency factor
- C6-New construction, not operational
- C7-Source closed, operation ceased
- C8-Computer calculated based on standards

This form is to include only the chemicals identified.

S-Stack Emissions F-Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

PLEASE NOTE: Be sure to attach all data and calculations necessary to support the emissions figures shown above.

Northeast Maryland Waste Disposal Authority - Gude Landfill

Reporting Year: **2018**

OPERATING DATA

Month	Flare Operation	
	Hours	Days
Jan	730.0	30.4
Feb	589.0	24.5
Mar	741.0	30.9
Apr	720.0	30.0
May	734.0	30.6
Jun	712.0	29.7
Jul	732.0	30.5
Aug	709.0	29.5
Sep	705.0	29.4
Oct	727.0	30.3
Nov	702.0	29.3
Dec	709.0	29.5
TOTAL	8,510.0	354.6

LANDFILL GAS USAGE DATA

Month	LFG to Flare (MMscf)	Avg LFG Flare Flow Rate (cfm)	Avg Flare Methane Content ¹ (%)	Avg Flare Carbon Dioxide Content ² (%)
Jan	21.90	500.0	35.73%	27.6%
Feb	17.42	493.0	37.50%	28.6%
Mar	20.23	455.0	37.47%	27.7%
Apr	20.13	466.0	39.45%	28.6%
May	19.99	454.0	35.05%	27.3%
Jun	19.05	446.0	35.62%	27.7%
Jul	19.28	439.0	34.90%	25.6%
Aug	18.25	429.0	38.50%	29.1%
Sep	16.92	400.0	38.52%	30.1%
Oct	18.32	420.0	39.14%	28.9%
Nov	18.83	447.0	39.03%	29.9%
Dec	19.44	457.0	41.65%	29.6%
TOTAL	229.8	-	-	-
AVERAGE	-	450.5	37.71%	28.4%

¹ CH4 readings derived from daily operator plant readings.

² CO2 readings derived from monthly GEM readings. For missing readings, the months prior and following a missing reading are averaged.

DEVICE DESTRUCTION EFFICIENCIES FOR LFG CONSTITUENTS

Flare System **98.0%** Manufacturer design for NMOC; Permit 031-2253

LFG ANALYSIS DATA

Component	Concentration (ppmv)
Total Reduced Sulfur (TRS)	3.52
VOC (as Hexane)	235

AP-42 Table 2.4-2 footnote

Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2018

Summary of LFG Flow Data and Operating Parameters		
Parameter	Units	Flare System
Site-specific CH4 Content	%	37.7%
Site-specific CO2 Content	%	28.4%
Site-specific LFG Heat Content	Btu/scf of LFG	377.14
Site-specific LFG Flow to Device	MMscf/yr	229.77
CH4 Flow to Device	MMscf/yr	86.65
Days per Year of Operation	Days/Yr	354.58
Hours per Year of Operation	Hrs/Yr	8,510.00
LFG Flow to Device, Apr-Sep	MMscf	113.63
CH4 Flow to Device, Apr-Sep	MMscf	42.01
Hours of Operation, Apr-Sep	Hours	4,312.00
Days of Operation, Apr-Sep	Days	179.67

Sample Calculations:

1. Site-specific LFG Heat Content

Standard CH4 heat content = 1000 Btu/scf

LFG Heat Content (Btu/scf) = CH4 Content of LFG (%) * CH4 Heat Content (Btu/scf)

2. CH4 Flow to Device

CH4 Flow to Device (MMScf) = CH4 Content (%) * LFG Flow to Device (MMscf)

3. Normalized LFG Flow to Device (adjusted to 50% CH4)

Normalized LFG Flow to Device (MMscf) = Site-specific LFG flow (MMscf) * Site-specific CH4 Content (%) / Standard CH4 Content (50%)

Equipment	Pollutant	Factor	Units	Reference
Flare	NOx	80	lb/MMdscf CH4	Manufacturer data
Flare	CO	200	lb/MMdscf CH4	Manufacturer data
Flare	VOC	51.71	lb/MMdscf LFG	Concentration in LFG; AP-42 Section 2.4, equations 3 and 4
Flare	TPM	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
Flare	TPM10	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
Flare	TPM2.5	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
Flare	FPM	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
Flare	FPM10	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
Flare	FPM2.5	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
Flare	CPM	11.25	lb/MMdscf CH4	Historical calculations; CPM/TPM = 0.75, AP-42 Table 1.4-2
Flare	SO2	0.58	lb/MMdscf LFG	TRS concentration in LFG; AP-42 Section 2.4, equations 3 and 4
Flare	CH4	Mass Balance		
Flare	CO2	Mass Balance		
Flare	N2O	6.30E-04	kg/MMBtu	40 CFR 98 Table C-2

Calculation Constants		
298	deg K	Default temperature of LFG, 25 deg C, AP-42 Section 2.4
32	g/gmol	MW of total reduced sulfur (TRS)
64	g/gmol	MW of SO2
8.21E-05	m ³ - atm/gmol - K	Ideal gas constant
35.31	ft ³ /m ³	conversion factor
453.6	g/lb	conversion factor
86.18	g/gmol	MW of VOC as Hexane (AP-42 Table 2.4-2)

Criteria Pollutant Emissions Summary
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2018

Device: **Landfill Gas Flare System**

Pollutant	Actual Emissions		Emissions Basis	TOSD*
	TPY	lb/day		
NOx	3.47	19.55	Manufacturer Data	18.71
CO	8.67	48.88	Manufacturer Data	-
VOC	0.12	0.67	AP-42, manuf control eff.	0.24
TPM	0.65	3.67	AP-42	-
TPM10	0.65	3.67	AP-42	-
TPM2.5	0.65	3.67	AP-42	-
FPM	0.16	0.92	Historical calcs, AP-42	-
FPM10	0.16	0.92	Historical calcs, AP-42	-
FPM2.5	0.16	0.92	Historical calcs, AP-42	-
CPM	0.49	2.75	Historical calcs, AP-42	-
SO2	0.07	0.37	LFG test data, AP-42	-

* TOSD = Typical Ozone Season Day (Apr-Sep), applies to NOx and VOC only.

Toxic Air Pollutant Emissions
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2018

LFG Flow to Flares = 229.77 MMscf/yr
 Flare Operating Days = 354.58 days/yr
 Flare Operating Hours = 8510 hrs/yr

Pollutant	Molecular Weight (g/gmol)	Concentration (ppmv)	Flare Pollutant Inflow (lb/yr)	Flare Destruction Efficiency	Flare Emissions		
					(lb/day)	(lb/hr)	(ton/yr)
1,1,1-Trichloroethane (methyl chloroform)	133.4	0.04	3.1	98.0%	0.00	0	0
1,1,2,2-Tetrachloroethane	167.85	0.06	5.9	98.0%	0.00	0.0	0.0
1,1,2,3,4,4-Hexachloro-1,3-butadiene (Hexachlorobutadiene)	260.76	0.06	9.2	98.0%	0.00	0.000	0.00
1,1,2-Trichloroethane	133.4	0.06	4.7	98.0%	0.00	0.0	0
1,1-Dichloroethane (ethylidene dichloride)	98.96	1.18	68.5	98.0%	0.00	0	0
1,1-Dichloroethene (vinylidene chloride)	96.94	0.06	3.4	98.0%	0.00	0.0	0
1,2,4-Trichlorobenzene	181.45	0.06	6.4	98.0%	0.00	0.0	0
1,2-Dichloroethane (ethylene dichloride)	98.96	0.06	3.5	98.0%	0.00	0.0	0.00
1,2-Dichloropropane (propylene dichloride)	112.99	0.06	4.0	98.0%	0.00	0	0
1,3-Butadiene (vinyl ethylene)	54.09	0.06	1.9	98.0%	0.00	0.00	0.000
1,3-Dichloropropene	110.97	0.06	3.9	98.0%	0.00	0.00	0.00
1,4-Dichlorobenzene	147.02	0.04	3.4	98.0%	0.00	0	0.0
1,4-Dioxane (1,4-diethylene dioxide)	88.11	0.06	3.1	98.0%	0.00	0	0.0
2,2,4-Trimethylpentane	114.23	0.06	4.0	98.0%	0.00	0.0	0
2-Butanone (methyl ethyl ketone)	72.11	1.27	53.7	98.0%	0.00	0	0
4-Methyl-2-pentanone (Methyl isobutyl ketone)	100.16	0.06	3.5	98.0%	0.00	0	0
Acrylonitrile *	53.06	6.33	196.9	98.0%	0.01	0.00	0.00
Allyl chloride (3-Chloro-1-propene)	76.52	0.06	2.7	98.0%	0.00	0.00	0.0
Benzene	78.11	0.272	12.5	98.0%	0.00	0.00	0.0
Benzyl chloride	126.58	0.06	4.5	98.0%	0.00	0.00	0.0
Bromomethane (Methyl bromide)	94.94	0.06	3.3	98.0%	0.00	0.00	0.00
Bromoethene (Vinyl bromide)	106.95	0.06	3.8	98.0%	0.00	0.0	0
Carbon disulfide	76.14	0.06	2.7	98.0%	0.00	0.0	0
Carbon tetrachloride	153.82	0.04	3.6	98.0%	0.00	0.0	0.00
Carbonyl sulfide (Carbon oxysulfide) *	60.08	0.49	17.3	98.0%	0.00	0.0	0
Chlorine *	35.45	42	873.0	n/a	n/a	n/a	n/a
Chlorobenzene	112.56	0.06	4.0	98.0%	0.00	0.0	0
Chloroethane (Ethyl chloride)	64.51	0.208	7.9	98.0%	0.00	0.000	0.00
Chloromethane (Methyl chloride)	50.49	0.06	1.8	98.0%	0.00	0.0	0.0
Dichloromethane (Methylene chloride)	84.93	0.115	5.7	98.0%	0.00	0	0
Ethylbenzene	106.17	0.868	54.0	98.0%	0.00	0	0
Hexachlorobutadiene	260.76	0.06	9.2	98.0%	0.00	0.000	0.00
n-Hexane	86.18	0.78	39.4	98.0%	0.00	0	0
Hydrochloric Acid *	36.46	42	897.9	0.0%	2.53	0.1	0.4
Mercury (Total) *	200.59	0.000292	0.0	0.0%	0.00	0.0000	0.000
Methyl tert-butyl ether (MTBE)	88.15	0.084	4.3	98.0%	0.00	0	0
Styrene (Vinylbenzene)	104.15	0.06	3.7	98.0%	0.00	0	0
Tetrachloroethylene (Perchloroethylene)	165.83	0.265	25.8	98.0%	0.00	0	0
Toluene (Methyl benzene)	92.14	4.16	224.8	98.0%	0.01	0	0
Tribromomethane (Bromoform)	252.73	0.04	5.9	98.0%	0.00	0.00	0.0
Trichloroethylene (Trichloroethene)	131.39	0.158	12.2	98.0%	0.00	0	0
Trichloromethane (Chloroform)	119.38	0.04	2.8	98.0%	0.00	0.0	0.00
Vinyl acetate	86.09	0.06	3.0	98.0%	0.00	0.0	0
Vinyl chloride (Chloroethene)	62.5	1.78	65.2	98.0%	0.00	0.0	0.00
Xylenes (o-, m-, p-, mixtures)	106.17	0.39	24.3	98.0%	0.00	0	0
Total Air Toxics					2.58	0.10	0.40

* Laboratory data not available; default values from AP-42 Section 2.4 were used.

Pollutant Inflow (lb/yr) = Conc (ppmv)/10⁶ * MW (g/gmol) / 8.21E-05 (atm-m³/gmol-K) / 298 K / 35.31 (ft³/m³) / 453.6 (g/lb) * 10⁶ (scf/MMscf)
 * LFG flow (MMscf/yr)

Greenhouse Gas Emissions
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2018

Calculation Constants and Input Parameters

Description	Value	Units
Default temperature of LFG, 25 deg C, AP-42 Section 2.4	298	deg K
Ideal gas constant	8.21E-05	(m ³ - atm) / (gmol - K)
MW of CO2	44.01	g/gmol
MW of CH4	16.044	g/gmol
Default N2O factor, 40 CFR 98 Table C-2	6.30E-04	kg/MMBtu

Emissions Parameter	Units	Flares
Site-specific CO2 Content of LFG	%	28.4%
Site-specific CH4 Content of LFG	%	37.7%
Site-specific LFG heat content	Btu/scf	377.1
LFG Flow to Device	MMscf/yr	229.77
Days of Operation	Days/Yr	354.58
Hours of Operation	Hrs/Yr	8510.00
Destruction Efficiency	%	98.0%
Volume of CO2 Emissions	MMscf/yr	151.87
Mass of CO2 Emissions	TPY	8533.6
	lb/day	48133.1
	lb/hr	2005.5
Volume of CH4 Emissions	MMscf/yr	1.733
Mass of CH4 Emissions	TPY	35.5
	lb/day	200.2
	lb/hr	8.3
Mass of N2O Emissions	TPY	0.06
	lb/day	0.34
	lb/hr	0.01

Calculation Notes:

1. CO2 Emissions

- Burning LFG produces CO2, and LFG also contains CO2.
- The CO2 emissions from burning LFG are calculated using the site-specific CH4 and CO2 contents of the LFG and assuming that all CH4 in the LFG is burned. 1 mole of CH4 produces 1 mole of CO2.

Sample Calculations for CO2 :

- Volume of Emissions (MMscf/yr) = LFG flow to device (MMscf/yr) * (LFG CO2 content % + LFG CH4 content %)
- Mass of Emissions (lb/yr) = Volume Emissions (MMscf/yr) * 10⁶ (scf/MMscf) / 35.31 (cf/m³) * MW (g/gmol) / Gas Constant (atm-m³/gmol-K) / LFG Temperature (K) / 453.6 (g/lb)

2. CH4 Emissions

- LFG contains CH4. Uncombusted CH4 is released from the flares.

Sample Calculations for CH4:

- Volume of Emissions (MMscf/yr) = LFG flow to device (MMscf/yr) * LFG CH4 content (%) * (1-Destruction Efficiency %)
- Mass of Emissions (lb/yr) = Volume Emissions (MMscf/yr) * 10⁶ (scf/MMscf) / 35.31 (cf/m³) * MW (g/gmol) / Gas Constant (atm-m³/gmol-K) / LFG Temperature (K) / 453.6 (g/lb)

3. N2O Emissions

N2O Emissions (ton/yr) = LFG flow to device (MMscf/yr) * LFG Heat content (Btu/scf) * N2O factor (kg/MMBtu) * 2.2 (lb/kg) / 2000 (lb/ton)