

March 31, 2016

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

Subject: 2016 Annual Emission Certification Report & Analysis of Toxic Air Pollutants
Gude Landfill, Rockville, MD

Dear Laramie:

The Northeast Maryland Waste Disposal Authority is pleased to submit two copies of the 2016 Annual Emissions Certification Report and Analysis of Toxic Air Pollutants for the Gude Landfill Gas-to-Energy Project in Montgomery County, Maryland (Operating Permit 031-02253) as required by COMAR 26.11.01.05-1 and 26.11.02.19D.

The report documents were completed using operating data recorded by facility representatives, results of emissions testing performed at the facility and default emission factor data provided by the USEPA.

The facility is in compliance with Maryland's Air Toxic Regulations (COMAR 26.11.15) for the calendar year 2016.

If you have any questions regarding this report, please do not hesitate to contact me.

Sincerely,



Chris Skaggs
Executive Director

Cc: Rao Malladi
Don Birnesser

MCLFG11738MLA

410.333.2730 / 410.333.2721 fax / authority@nmwda.org
nmwda.org / Business-to-Business Recycling: mdrecycles.org
Tower II - Suite 402, 100 S. Charles Street, Baltimore, MD 21201-2705

Comprehensive Waste Management Through Recycling, Reuse, Resource Recovery and Landfill

MEMBERS: Rhody R. Holthaus, Anne Arundel County / Rudolph S. Chow, Baltimore City / Steven A. Walsh, Baltimore County
Jeffrey D. Castonguay, Carroll County / Michael G. Marschner, Frederick County / Joseph J. Siemek, Harford County / James M. Irvin, Howard County
Daniel E. Locke, Montgomery County / Director, Maryland Environmental Service / Christopher Skaggs, Executive Director



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Completed Forms

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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: 2016

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</u> (<i>Dec.-Feb.</i>)	<u>Spring</u> (<i>Mar - May</i>)	<u>Summer</u> (<i>Jun - Aug</i>)	<u>Fall</u> (<i>Sept - Nov</i>)		
<i>25%</i>	<i>25%</i>	<i>25%</i>	<i>25%</i>		
				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>848 kW GE Jenbacher Engine</i>		<i>N/A</i>		<i>97.2%(AP-42)</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 18 pages (including attachments), and certify that the information is correct to the best of my knowledge.

CHRISTOPHER SKAGGS

EXECUTIVE DIRECTOR

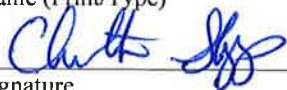
03/31/2017

Name (Print/Type)

Title

Date

Signature



410-333-2730

Telephone

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FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2016

Facility Name: Gude Landfill Gas-to-Energy Facility

Facility ID: 031-02253

Pollutant: VOC

Equipment Description/ Registration No.	SCC Number	Fuel	Actual Emissions		Operating Schedule (Actual)			TOSD Lbs/dy	Operating Schedule		Emissions Methods
			Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr		Days/yr	Hrs/dy	
Landfill Gas Flare System 9-0738		Landfill Gas	0.06	0.33	24	7	52	365	24		C3
GE Jenbacher Engine 9-0889		Landfill Gas	0.02	0.11	24	7	52	334	24		C1

Total			0.08	0.44				0.25			

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

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method
 A1-U.S. EPA Reference Method C1-User calculated based on source test or other measurement
 A2-Other Particulate Sampling Train C2-User calculated based on material balance using engineering knowledge of the process
 A3-Liquid Absorption Technique C3-User calculated based on AP-42
 A4-Solid Absorption Technique C4-User calculated by best guess/engineering Judgment
 A5-Freezing Out Technique
 A9-Other, Specify

C5-User calculated based on a State or local agency emission factor
 C6-New construction, not operational
 C7-Source closed, operation ceased
 C8-Computer calculated based on standard

1/09/08

FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

2016

Calendar Year:

Facility Name: Gude Landfill Gas-to-Energy Facility

Facility ID: 031-02253

Pollutant: NOX

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	
Landfill Gas Flare System 9-0738	S	Landfill Gas	1.81	9.90	24	7	52	365	10.56	24		C1
GE Jenbacher Engine 9-0889	F	Landfill Gas	10.42	62.40	24	7	52	334	62.40	24		C1
-----	S											
-----	F											
-----	S											
-----	F											
-----	S											
-----	F											
-----	S											
-----	F											
-----	S											
-----	F											
-----	S											
-----	F											
Total			12.23	72.30					72.96			

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

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

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 best guess/engineering Judgment
 C5-User calculated based on a State or local agency emission factor
 C6-New construction, not operational
 C7-Source closed, operation ceased
 C8-Computer calculated based on standard

1/09/08

FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: **2016**

Facility Name: **Gude Landfill Gas-to-Energy Facility**

Facility ID: **031-02253**

Pollutant: **SO2**

Equipment Description/ Registration No.	SCC Number	Fuel	Actual Emissions		Operating Schedule (Actual)			TOSD Lbs/dy	Operating Schedule		Emissions Methods
			Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr		Days/yr	Hrs/dy	
Landfill Gas Flare System 9-0738		Landfill Gas	0.03	0.18	24	7	52	365			C1, C3
GE Jenbacher Engine 9-0889		Landfill Gas	0.05	0.29	24	7	52	334			C1, C3

Total			0.08	0.47							

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

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

- 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 best guess/engineering Judgment

- C5-User calculated based on a State or local agency emission factor
- C6-New construction, not operational
- C7-Source closed, operation ceased
- C8-Computer calculated based on standard

FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2016

Facility Name: Gude Landfill Gas-to-Energy Facility

Facility ID: 031-02253

Pollutant: CO

Equipment Description/ Registration No.	SCC Number	Fuel	Actual Emissions		Operating Schedule (Actual)			TOSD Lbs/dy	Operating Schedule		Emissions Methods
			Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr		Days/yr	Hrs/dy	
Landfill Gas Flare System 9-0738	S	Landfill	4.52	24.74	24	7	52	365			C1
	F	Gas	--	--							
GE Jenbacher Engine -- 9-0889	S	Landfill	23.33	139.68	24	7	52	334			C1
	F	Gas	--	--							
-----	S										
-----	F										
-----	S										
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-----	S										
-----	F										
Total			27.84	164.42							

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

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

- 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 best guess/engineering Judgment
- C5-User calculated based on a State or local agency emission factor
- C6-New construction, not operational
- C7-Source closed, operation ceased
- C8-Computer calculated based on standard

FORM 3: PM

EMISSIONS CERTIFICATION REPORT

Calendar Year: 2016
 Particulate Matter
 Facility ID: 031-02253
 Pollutant: PM

Facility Name: Gude Landfill Gas-to-Energy Facility

Equipment Description/ Registration No.	SCC Number	Fuel	PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
			Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day		
Landfill Gas Flare System 9-0738		Landfill Gas	S 0.08	0.46	0.08	0.46	0.08	0.46	0.25	1.39	365	C3
GE Jenbacher Engine 9-0889		Landfill Gas	S 0.12	0.73	0.12	0.73	0.12	0.73	0.36	2.18	334	C3
-----			F --	--	--	--	--	--	--	--		
-----			F --	--	--	--	--	--	--	--		
-----			S --	--	--	--	--	--	--	--		
-----			F --	--	--	--	--	--	--	--		
-----			S --	--	--	--	--	--	--	--		
-----			F --	--	--	--	--	--	--	--		
-----			S --	--	--	--	--	--	--	--		
-----			F --	--	--	--	--	--	--	--		
-----			S --	--	--	--	--	--	--	--		
-----			F --	--	--	--	--	--	--	--		
-----			S --	--	--	--	--	--	--	--		
-----			F --	--	--	--	--	--	--	--		
Total			0.21	1.19	0.21	1.19	0.21	1.19	0.62	3.57		

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

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

- 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 best guess/engineering Judgment

- C5-User calculated based on a State or local agency emission factor
 C6-New construction, not operational
 C7-Source closed, operation ceased
 C8-Computer calculated based on standard

FORM 4:

TOXIC AIR POLLUTANTS

Calendar Year: 2016

EMISSIONS CERTIFICATION REPORT

Facility Name: Gude Landfill Gas-to-Energy Facility Facility ID: 031-02253 Pollutant: Hydrochloric Acid *

Equipment Description/ Registration Number ¹	Actual Emissions				Control Device**	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr			
Landfill Gas Flare System 9-0738	0.2	1.24	0.1		O	0
GE Jenbacher Engine 9-0889	0.3	1.95	0.1		O	0
TOTALS	0.5	3.19	0.2			

* Please attach all calculations.
 * See Attachment 1 for the minimum reporting values.
 **Control Device
 S = Scrubber
 B = Baghouse
 ESP = Electrostatic Precipitator
 A = Afterburner
 C = Condenser
 AD = Adsorbtion
 O = Other

¹Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 5:

BILLABLE TOXIC AIR POLLUTANTS

Calendar Year: **2016**

Emissions Certification Report

Facility Name: **Gude Landfill Gas-to-Energy Facility** Facility ID#: **031-02253**

Chemical Name	CAS Number	Actual Emissions			Estimation Method
		Tons/year	Lbs/day	Lbs/hr	
carbon disulfide	75-15-0	S	0.00	0.00	C1
		F			
carbonyl sulfide	463-58-1	S	0.00	0.00	C3
		F			
chlorine	7782-50-5	S	N/A	N/A	
		F			
cyanide compounds	57-12-5	S	N/A	N/A	
		F			
hydrochloric acid	7647-01-0	S	0.50	3.19	C3
		F			
hydrogen fluoride	7664-39-3	S	N/A	N/A	
		F			
methyl chloroform	71-55-6	S	0.00	0.00	C1
		F			
methylene chloride	75-09-2	S	0.00	0.00	C1
		F			
perchloroethylene	127-18-4	S	0.00	0.00	C1
		F			
phosphine	7803-51-2	S	N/A	N/A	
		F			
titanium tetrachloride	7550-45-0	S	N/A	N/A	
		F			
TOTALS		0.50	3.19	0.20	

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.

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

2016

Calendar Year:

EMISSIONS CERTIFICATION REPORT

031-02253

Carbon Dioxide

Pollutant: *

Facility ID:

Gude Landfill Gas-to-Energy Facility

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
Landfill Gas Flare System 9-0738	4,435.0	24,301.6	1,012.6
GE Jenbacher Engine 9-0889	6,401.2	38,326.0	1,596.9

TOTALS	10,836.3	62,627.6	2,609.5

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.
* Please attach all calculations.

¹Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

2016

Calendar Year:

EMISSIONS CERTIFICATION REPORT

Facility Name: Gude Landfill Gas-to-Energy Facility Facility ID: 031-02253

Pollutant: Methane

* * *

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
Landfill Gas Flare System 9-0738	18.5	101.4	4.2
GE Jenbacher Engine 9-0889	37.5	222.4	9.3

TOTALS	55.6	323.8	13.5

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.
* Please attach all calculations.

¹Emissions must be broken down by equipment registration number (ex 9-0076, 9-0077)

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

2016

Calendar Year:

EMISSIONS CERTIFICATION REPORT

031-02253

Gude Landfill Gas-to-Energy Facility

Facility ID:

N20

Pollutant:

*

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
Landfill Gas Flare System 9-0738	0.03	0.17	0.01
GE Jenbacher Engine 9-0889	0.04	0.27	0.01

TOTALS	0.08	0.44	0.02

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.
* Please attach all calculations.

¹Emissions must be broken down by equipment registration number (ex 9-0076, 9-0077)

Northeast Maryland Waste Disposal Authority - Gude Landfill
 Reporting Year: 2016

Denotes Input Data

OPERATING DATA

Month	Flare Operation		JEN Engine Operation	
	Hours	Days	Hours	Days
Jan	744.0	31.0	601.0	25.0
Feb	672.0	28.0	680.0	28.3
Mar	744.0	31.0	729.0	30.4
Apr	720.0	30.0	716.0	29.8
May	744.0	31.0	506.0	21.1
Jun	720.0	30.0	684.0	28.5
Jul	744.0	31.0	715.0	29.8
Aug	744.0	31.0	542.0	22.6
Sep	720.0	30.0	693.0	28.9
Oct	744.0	31.0	704.0	29.3
Nov	720.0	30.0	717.0	29.9
Dec	744.0	31.0	730.0	30.4
TOTAL	8,760.0	365.0	8,017.0	334.0

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 (%)	LFG to JEN Engine (MMscf)	Avg LFG JEN Engine Flow Rate (cfm)	Avg Engine Methane Content ¹ (%)	Avg Engine Carbon Dioxide Content ² (%)
Jan ³	11.28	252.7	37.58%	29.6%	11.22	311.2	37.58%	29.6%
Feb ³	9.59	237.9	36.03%	31.4%	8.34	204.4	36.03%	31.4%
Mar	7.68	172.1	39.10%	28.6%	17.92	409.7	39.10%	29.7%
Apr	9.64	223.1	37.02%	29.0%	14.54	338.4	37.02%	29.9%
May	13.58	304.1	34.50%	31.3%	10.26	338.0	34.50%	31.5%
Jun	9.68	224.1	41.76%	29.4%	14.07	342.8	41.76%	30.1%
Jul	10.06	225.3	45.19%	28.2%	15.46	360.5	45.19%	28.7%
Aug	11.75	263.2	36.03%	28.6%	11.72	360.4	36.03%	29.1%
Sep	7.59	175.6	40.72%	26.8%	14.62	351.5	40.72%	28.0%
Oct	7.14	160.1	38.68%	27.9%	16.04	379.8	38.68%	27.7%
Nov	10.97	253.9	40.00%	30.1%	15.75	366.1	40.00%	28.8%
Dec	7.22	161.6	39.80%	28.0%	16.72	381.7	39.80%	29.4%
TOTAL	116.2	-	-	-	166.7	-	-	-
AVERAGE	-	221.1	38.87%	29.1%	-	345.4	38.87%	29.5%

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.

³ Flare CO2 readings for January and February 2016 are derived from plant readings

DEVICE DESTRUCTION EFFICIENCIES FOR LFG CONSTITUENTS

Flare System	98.0%	Manufacturer design for NMOC; Permit 031-2253
Jenbacher Engine	97.2%	AP-42 Table 2.4-3 (10/08)

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: 2016

Summary of LFG Flow Data and Operating Parameters			
Parameter	Units	Flare System	JEN Engine
Site-specific CH4 Content	%	38.9%	38.9%
Site-specific CO2 Content	%	29.1%	29.5%
Site-specific LFG Heat Content	Btu/scf of LFG	388.68	388.68
Site-specific LFG Flow to Device	MMscf/yr	116.17	166.65
CH4 Flow to Device	MMscf/yr	45.15	64.77
Days per Year of Operation	Days/Yr	365.00	334.04
Hours per Year of Operation	Hrs/Yr	8,760.00	8,017.00
LFG Flow to Device, Apr-Sep	MMscf	62.29	80.67
CH4 Flow to Device, Apr-Sep	MMscf	24.16	31.96
Hours of Operation, Apr-Sep	Hours	4,392.00	3,856.00
Days of Operation, Apr-Sep	Days	183.00	160.67

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%)

Calculation Constants	
298	deg K
32	lb/gmol
64	lb/gmol
8.21E-05	m ³ - atm/gmol · K
35.31	ft ³ /m ³
453.6	g/lb
86.18	g/gmol

Default temperature of LFG, 25 deg C, AP-42 Section 2.4
 MW of total reduced sulfur (TRS)
 MW of SO₂
 ideal gas constant
 conversion factor
 MW of VOC as Hexane (AP-42 Table 2.4-2)

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
GE Jenbacher Engine	NOx	2.6	lb/hr	Emissions test data (2/18/2016)
GE Jenbacher Engine	CO	5.82	lb/hr	Emissions test data (2/18/2016)
GE Jenbacher Engine	VOC	0.0046	lb/hr	Emissions test data (2/18/2016)
GE Jenbacher Engine	TPM	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
GE Jenbacher Engine	TPM10	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
GE Jenbacher Engine	TPM2.5	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
GE Jenbacher Engine	FPM	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
GE Jenbacher Engine	FPM10	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
GE Jenbacher Engine	FPM2.5	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
GE Jenbacher Engine	CPM	11.25	lb/MMdscf CH4	Historical calculations; CPM/TPM = 0.75, AP-42 Table 1.4-2
GE Jenbacher Engine	SO2	0.58	lb/MMdscf LFG	TRS concentration in LFG; AP-42 Section 2.4, equations 3 and 4
GE Jenbacher Engine	CH4	Mass Balance		
GE Jenbacher Engine	CO2	Mass Balance		
GE Jenbacher Engine	N2O	6.30E-04	kg/MMBtu	40 CFR 98 Table C-2

Criteria Pollutant Emissions Summary
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2016

Device: **Landfill Gas Flare System**

Pollutant	Actual Emissions		Emissions Basis	TOSD* lb/day
	TPY	lb/day		
NOx	1.81	9.90	Manufacturer Data	10.56
CO	4.52	24.74	Manufacturer Data	-
VOC	0.06	0.33	AP-42, manuf control eff.	0.14
TPM	0.34	1.86	AP-42	-
TPM10	0.34	1.86	AP-42	-
TPM2.5	0.34	1.86	AP-42	-
FPM	0.08	0.46	Historical calcs, AP-42	-
FPM10	0.08	0.46	Historical calcs, AP-42	-
FPM2.5	0.08	0.46	Historical calcs, AP-42	-
CPM	0.25	1.39	Historical calcs, AP-42	-
SO2	0.03	0.18	LFG test data, AP-42	-

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

Criteria Pollutant Emissions Summary
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2016

Device: **GE Jenbacher Engine**

Pollutant	Actual Emissions		Emissions Basis	TOSD* lb/day
	TPY	lb/day		
NOx	10.42	62.40	Test data	62.40
CO	23.33	139.68	Test data	-
VOC	0.02	0.11	Test data	0.11
TPM	0.49	2.91	AP-42	-
TPM10	0.49	2.91	AP-42	-
TPM2.5	0.49	2.91	AP-42	-
FPM	0.12	0.73	Historical calcs, AP-42	-
FPM10	0.12	0.73	Historical calcs, AP-42	-
FPM2.5	0.12	0.73	Historical calcs, AP-42	-
CPM	0.36	2.18	Historical calcs, AP-42	-
SO2	0.05	0.29	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: 2016

LFG Flow to Flares = 116.17 MMscf/yr
 Flare Operating Days = 365.00 days/yr
 Flare Operating Hours = 8760 hrs/yr

LFG Flow to JEN Engine = 166.65 MMscf/yr
 JEN Engine Operating Days = 334.04 days/yr
 JEN Engine Operating Hours = 8017.00 hrs/yr

Pollutant	Molecular Weight (g/mol)	Concentration (ppmv)	Flare Pollutant Inflow (lb/yr)	Flare Destruction Efficiency	Flare Emissions		JEN Engine Pollutant Inflow (lb/yr)	JEN Engine Destruction Efficiency	JEN Engine Emissions		Facility Total Emissions	
					(lb/day)	(ton/yr)			(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
1,1,1-Trichloroethane (methyl chloroform)	133.4	0.04	1.6	98.0%	0.00	0	2.3	97.2%	0.00	0	0.00	0
1,1,2,2-Tetrachloroethane	167.85	0.06	3.0	98.0%	0.00	0.0	4.3	97.2%	0.00	0	0.00	0
1,1,2,3,4-Pentachloro-1,3-butadiene (hexachlorobutadiene)	260.76	0.05	4.6	98.0%	0.00	0.00	6.7	97.2%	0.00	0.00	0.00	0.00
1,1,2-Trichloroethane	133.4	0.06	4.5	98.0%	0.00	0	3.6	97.2%	0.00	0.00	0.00	0.00
1,1-Dichloroethane (ethylene dichloride)	98.95	1.18	34.6	98.0%	0.00	0	49.7	97.2%	0.00	0	0.01	0
1,1-Dichloroethene (vinylidene dichloride)	96.94	0.06	1.7	98.0%	0.00	0	3.2	97.2%	0.00	0	0.00	0
1,2,4-Trichlorobenzene	181.45	0.05	3.2	98.0%	0.00	0	4.6	97.2%	0.00	0	0.00	0
1,2-Dichloroethane (ethylene dichloride)	98.95	0.06	1.8	98.0%	0.00	0.00	3.2	97.2%	0.00	0.00	0.00	0.00
1,2-Dichloropropane (propylene dichloride)	112.99	0.05	2.0	98.0%	0.00	0	3.2	97.2%	0.00	0	0.00	0
1,3-Butadiene (vinyl acetylene)	54.09	0.06	1.0	98.0%	0.00	0.00	1.2	97.2%	0.00	0.00	0.00	0.00
1,3-Dichloropropane	110.97	0.06	2.0	98.0%	0.00	0.00	2.8	97.2%	0.00	0.00	0.00	0.00
1,4-Dichlorobenzene	147.02	0.04	1.7	98.0%	0.00	0	2.5	97.2%	0.00	0	0.00	0
1,4-Dioxane (1,4-dioxylene slowdax)	88.11	0.06	1.6	98.0%	0.00	0	2.2	97.2%	0.00	0	0.00	0
2,2,4-Trimethylpentane	114.23	0.06	2.0	98.0%	0.00	0	2.9	97.2%	0.00	0	0.00	0
2-Butanone (methyl ethyl ketone)	72.11	1.27	27.1	98.0%	0.00	0	38.9	97.2%	0.00	0	0.00	0
4-Methyl-2-pentanone (Methyl isobutyl ketone)	100.16	0.06	1.8	98.0%	0.00	0	2.6	97.2%	0.00	0	0.00	0
Acrylonitrile*	53.05	6.33	99.6	98.0%	0.01	0.00	142.8	97.2%	0.01	0.00	0.02	0.00
Allyl chloride (3-Chloro-1-propene)	76.52	0.06	1.1	98.0%	0.00	0.01	2.0	97.2%	0.00	0.00	0.00	0.00
Benzene	78.11	0.277	6.3	98.0%	0.00	0.00	9.0	97.2%	0.00	0.00	0.00	0.00
Bromochloride	126.58	0.06	2.3	98.0%	0.00	0.00	3.2	97.2%	0.00	0.00	0.00	0.00
Bromomethane (Methyl bromide)	94.94	0.06	1.7	98.0%	0.00	0.00	2.4	97.2%	0.00	0.00	0.00	0.00
Bromomethane (Vinyl bromide)	106.95	0.06	1.9	98.0%	0.00	0	2.7	97.2%	0.00	0	0.00	0
Carbon disulfide	76.14	0.06	1.4	98.0%	0.00	0	1.9	97.2%	0.00	0	0.00	0
Carbon tetrachloride	153.82	0.04	1.5	98.0%	0.00	0.00	2.6	97.2%	0.00	0.00	0.00	0.00
Carbonyl sulfide (Carbon oxy-sulfide)*	60.08	0.49	8.1	98.0%	0.00	0	12.5	97.2%	0.00	0	0.00	0
Chlorine*	35.45	4.2	44.1	n/a	n/a	n/a	633.2	n/a	n/a	n/a	n/a	n/a
Chlorobenzene	112.56	0.06	2.0	98.0%	0.00	0	2.9	97.2%	0.00	0	0.00	0
Chloroethane (Ethyl chloride)	64.51	0.208	4.0	98.0%	0.00	0.00	5.7	97.2%	0.00	0.00	0.00	0.00
Chloromethane (Methyl chloride)	50.49	0.30	7.9	98.0%	0.00	0.01	1.3	97.2%	0.00	0.00	0.00	0.00
Dibromomethane (Methylene chloride)	84.93	0.115	2.9	98.0%	0.00	0	4.2	97.2%	0.00	0	0.00	0
Ethylbenzene	106.17	0.866	27.3	98.0%	0.00	0	39.2	97.2%	0.00	0	0.00	0
Hexachlorobutadiene	260.76	0.06	4.6	98.0%	0.00	0	6.7	97.2%	0.00	0.00	0.00	0.00
n-Hexane	86.18	0.78	19.3	98.0%	0.00	0	28.6	97.2%	0.00	0	0.00	0
Hydrochloric Acid*	36.46	4.2	45.4	0.0%	1.24	0.1	651.2	0.0%	1.95	0.1	3.3	0.2
Mercury (Total)*	200.59	0.00292	0.0	0.0%	0.00	0.00	0.0	0.00	0.00	0.00	0.00	0.00
Methyl tert-butyl ether (MTBE)	88.15	0.084	2.2	98.0%	0.00	0	3.1	97.2%	0.00	0	0.00	0
Styrene (Vinylbenzene)	104.15	0.06	1.9	98.0%	0.00	0	2.7	97.2%	0.00	0	0.00	0
Tetrachloroethylene (Perchloroethylene)	165.83	0.285	11.0	98.0%	0.00	0	18.7	97.2%	0.00	0	0.00	0
Toluene (Methyl benzene)	92.14	4.16	113.6	98.0%	0.01	0	163.0	97.2%	0.01	0	0.02	0
Triisobutylene (Triisobutylene)	252.73	0.04	3.0	98.0%	0.00	0.00	4.3	97.2%	0.00	0.00	0.00	0.00
Triisobutylene (Triisobutylene)	131.39	0.138	6.2	98.0%	0.00	0	8.8	97.2%	0.00	0	0.00	0
Trichloromethane (Chloroform)	119.38	0.04	1.4	98.0%	0.00	0.00	2.0	97.2%	0.00	0.00	0.00	0.00
Vinyl acetate	86.09	0.06	1.5	98.0%	0.00	0	2.2	97.2%	0.00	0	0.00	0
Vinyl chloride (Chloroethene)	62.5	1.78	33.0	98.0%	0.00	0	47.3	97.2%	0.00	0	0.01	0.00
Xylenes (p-, m-, o- mixtures)	106.17	0.39	12.3	98.0%	0.00	0	17.6	97.2%	0.00	0	0.00	0
Total Air Toxic			1.27		0.10	0.20	17.6		2.01	0.10	0.30	3.28

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

Pollutant Inflow (lb/yr) = Conc (ppmv) * 10⁶ * MW (g/mol) / 8.21E-05 (atm-m³/gmol-K) / 298 K / 35.31 (ft³/m³) / 433.6 (g/lb) * 10⁶

Greenhouse Gas Emissions

Northeast Maryland Waste Disposal Authority - Gude Landfill

Reporting Year: 2016

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	JEN Engine
Site-specific CO2 Content of LFG	%	29.1%	29.5%
Site-specific CH4 Content of LFG	%	38.9%	38.9%
Site-specific LFG heat content	Btu/scf	388.7	388.7
LFG Flow to Device	MMscf/yr	116.17	166.65
Days of Operation	Days/Yr	365.00	334.04
Hours of Operation	Hrs/Yr	8760.00	8017.00
Destruction Efficiency	%	98.0%	97.2%
Volume of CO2 Emissions	MMscf/yr	78.93	113.92
Mass of CO2 Emissions	TPY	4435.0	6401.2
	lb/day	24301.6	38326.0
	lb/hr	1012.6	1596.9
Volume of CH4 Emissions	MMscf/yr	0.903	1.814
Mass of CH4 Emissions	TPY	18.5	37.2
	lb/day	101.4	222.4
	lb/hr	4.2	9.3
Mass of N2O Emissions	TPY	0.03	0.04
	lb/day	0.17	0.27
	lb/hr	0.01	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 :

- a. Volume of Emissions (MMscf/yr) = LFG flow to device (MMscf/yr) * (LFG CO2 content % + LFG CH4 content %)
- b. 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 and engines.

Sample Calculations for CH4:

- a. Volume of Emissions (MMscf/yr) = LFG flow to device (MMscf/yr) * LFG CH4 content (%) * (1-Destruction Efficiency %)
- b. 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

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: 2016

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>		AIRS Code	
Zip Code <i>20850</i>				FINDS Code	
B. Briefly describe the major function of the facility					
<i>Landfill Gas To Energy</i>					
SIC Code					
Facility Number:					
TEMPO ID:					
C. SEASONAL PRODUCTION (% if applicable)					
<u>Winter</u> (<i>Dec.-Feb.</i>)		<u>Spring</u> (<i>Mar - May</i>)		<u>Summer</u> (<i>Jun - Aug</i>)	
<u>Fall</u> (<i>Sept - Nov</i>)				Reviewed by:	
<i>25%</i>		<i>25%</i>		<i>25%</i>	
<i>25%</i>		<i>25%</i>		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>848 kW GE Jenbacher Engine</i>		<i>N/A</i>		<i>97.2%(AP-42)</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 18 pages (including attachments), and certify that the information is correct to the best of my knowledge.

CHRISTOPHER SKAGGS

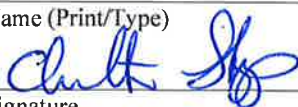
EXECUTIVE DIRECTOR

03/31/2017

Name (Print/Type)

Title

Date



410-333-2730

Signature

Telephone

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FORM 3: PM

EMISSIONS CERTIFICATION REPORT

Calendar Year: 2016

Particulate Matter

Facility Name: Gude Landfill Gas-to-Energy Facility

Facility ID: 031-02253

Pollutant: PM

Equipment Description/ Registration No.	SCC Number	Fuel	PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
			Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day		
Landfill Gas Flare System 9-0738		Landfill Gas	S 0.08	0.46	S 0.08	0.46	S 0.08	0.46	0.25	1.39	365	C3
GE Jenbacher Engine 9-0889		Landfill Gas	S 0.12	0.73	S 0.12	0.73	S 0.12	0.73	0.36	2.18	334	C3
-----			F --	--	F --	--	F --	--	--	--		
-----			S --	--	S --	--	S --	--	--	--		
-----			F --	--	F --	--	F --	--	--	--		
-----			S --	--	S --	--	S --	--	--	--		
-----			F --	--	F --	--	F --	--	--	--		
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-----			S --	--	S --	--	S --	--	--	--		
-----			F --	--	F --	--	F --	--	--	--		
-----			S --	--	S --	--	S --	--	--	--		
-----			F --	--	F --	--	F --	--	--	--		
Total			0.21	1.19	0.21	1.19	0.21	1.19	0.62	3.57		

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

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

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 best guess/engineering Judgment

- C5-User calculated based on a State or local agency emission factor
- C6-New construction, not operational
- C7-Source closed, operation ceased
- C8-Computer calculated based on standard

FORM 4:

TOXIC AIR POLLUTANTS

Calendar Year: 2016

EMISSIONS CERTIFICATION REPORT

Facility Name: Gude Landfill Gas-to-Energy Facility Facility ID: 031-02253 Pollutant: Hydrochloric Acid *

Equipment Description/ Registration Number ¹	Actual Emissions				Control Device**	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr			
Landfill Gas Flare System 9-0738	0.2	1.24	0.1		O	0
GE Jenbacher Engine 9-0889	0.3	1.95	0.1		O	0

TOTALS	0.5	3.19	0.2			

* Please attach all calculations.
 * See Attachment 1 for the minimum reporting values.
 **Control Device
 S = Scrubber
 B = Baghouse
 ESP = Electrostatic Precipitator
 A = Afterburner
 C = Condenser
 AD = Adsorbtion
 O = Other

¹Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 5:

BILLABLE TOXIC AIR POLLUTANTS

Calendar Year: 2016

Emissions Certification Report

Facility Name: Gude Landfill Gas-to-Energy Facility Facility ID#: 031-02253

Chemical Name	CAS Number	Actual Emissions			Estimation Method
		Tons/year	Lbs/day	Lbs/hr	
carbon disulfide	75-15-0	S	0.00	0.00	C1
		F		0.00	
carbonyl sulfide	463-58-1	S	0.00	0.00	C3
		F		0.00	
chlorine	7782-50-5	S	N/A	N/A	
		F		N/A	
cyanide compounds	57-12-5	S	N/A	N/A	
		F		N/A	
hydrochloric acid	7647-01-0	S	0.50	3.19	C3
		F		0.20	
hydrogen fluoride	7664-39-3	S	N/A	N/A	
		F		N/A	
methyl chloroform	71-55-6	S	0.00	0.00	C1
		F		0.00	
methylene chloride	75-09-2	S	0.00	0.00	C1
		F		0.00	
perchloroethylene	127-18-4	S	0.00	0.00	C1
		F		0.00	
phosphine	7803-51-2	S	N/A	N/A	
		F		N/A	
titanium tetrachloride	7550-45-0	S	N/A	N/A	
		F		N/A	
TOTALS			0.50	3.19	0.20

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

- 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.

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

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

2016

Calendar Year:

EMISSIONS CERTIFICATION REPORT

Facility Name: Gude Landfill Gas-to-Energy Facility

Facility ID: 031-02253

Pollutant: Methane

* _____

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
<u>Landfill Gas Flare System 9-0738</u>	18.5	101.4	4.2
<u>GE Jenbacher Engine 9-0889</u>	37.5	222.4	9.3

TOTALS	55.6	323.8	13.5

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.
* Please attach all calculations.

¹Emissions must be broken down by equipment registration number (ex 9-0076, 9-0077)

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

2016

Calendar Year: _____

EMISSIONS CERTIFICATION REPORT

Facility Name: Gude Landfill Gas-to-Energy Facility

Facility ID: 031-02253

Pollutant: N2O

Pollutant: _____ *

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
Landfill Gas Flare System 9-0738	0.03	0.17	0.01
GE Jenbacher Engine 9-0889	0.04	0.27	0.01

TOTALS	0.08	0.44	0.02

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.
* Please attach all calculations.

¹Emissions must be broken down by equipment registration number (ex 9-0076, 9-0077)

Northeast Maryland Waste Disposal Authority - Gude Landfill
 Reporting Year: 2016

Denotes Input Data

OPERATING DATA

Month	Flare Operation		JEN Engine Operation	
	Hours	Days	Hours	Days
Jan	744.0	31.0	601.0	25.0
Feb	672.0	28.0	680.0	28.3
Mar	744.0	31.0	729.0	30.4
Apr	720.0	30.0	716.0	29.8
May	744.0	31.0	506.0	21.1
Jun	720.0	30.0	684.0	28.5
Jul	744.0	31.0	715.0	29.8
Aug	744.0	31.0	542.0	22.6
Sep	720.0	30.0	693.0	28.9
Oct	744.0	31.0	704.0	29.3
Nov	720.0	30.0	717.0	29.9
Dec	744.0	31.0	730.0	30.4
TOTAL	8,760.0	365.0	8,017.0	334.0

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 (%)	LFG to JEN Engine (MMscf)	Avg LFG JEN Engine Flow Rate (cfm)	Avg Engine Methane Content ¹ (%)	Avg Engine Carbon Dioxide Content ² (%)
Jan ³	11.28	252.7	37.58%	29.6%	11.22	311.2	37.58%	29.6%
Feb ³	9.59	237.9	36.03%	31.4%	8.34	204.4	36.03%	31.4%
Mar	7.68	172.1	39.10%	28.6%	17.92	409.7	39.10%	29.7%
Apr	9.64	223.1	37.02%	29.0%	14.54	338.4	37.02%	29.9%
May	13.58	304.1	34.50%	31.3%	10.26	338.0	34.50%	31.5%
Jun	9.68	224.1	41.76%	29.4%	14.07	342.8	41.76%	30.1%
Jul	10.06	225.3	45.19%	28.2%	15.46	360.5	45.19%	28.7%
Aug	11.75	263.2	36.03%	28.6%	11.72	360.4	36.03%	29.1%
Sep	7.59	175.6	40.72%	26.8%	14.62	351.5	40.72%	28.0%
Oct	7.14	160.1	38.68%	27.9%	16.04	379.8	38.68%	27.7%
Nov	10.97	253.9	40.00%	30.1%	15.75	366.1	40.00%	28.8%
Dec	7.22	161.6	39.80%	28.0%	16.72	381.7	39.80%	29.4%
TOTAL	116.2	-	-	-	166.7	-	-	-
AVERAGE	-	221.1	38.87%	29.1%	-	345.4	38.87%	29.5%

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.

³ Flare CO2 readings for January and February 2016 are derived from plant readings

DEVICE DESTRUCTION EFFICIENCIES FOR LFG CONSTITUENTS

Flare System	98.0%	Manufacturer design for NMOC; Permit 031-2253
Jenbacher Engine	97.2%	AP-42 Table 2.4-3 (10/08)

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: 2016

Summary of LFG Flow Data and Operating Parameters			
Parameter	Units	Flare System	JEN Engine
Site-specific CH4 Content	%	38.9%	38.9%
Site-specific CO2 Content	%	29.1%	29.5%
Site-specific LFG Heat Content	Btu/scf of LFG	388.68	388.68
Site-specific LFG Flow to Device	MMscf/yr	116.17	166.65
CH4 Flow to Device	MMscf/yr	45.15	64.77
Days per Year of Operation	Days/Yr	365.00	334.04
Hours per Year of Operation	Hrs/Yr	8,760.00	8,017.00
LFG Flow to Device, Apr-Sep	MMscf	62.29	80.67
CH4 Flow to Device, Apr-Sep	MMscf	24.16	31.96
Hours of Operation, Apr-Sep	Hours	4,392.00	3,856.00
Days of Operation, Apr-Sep	Days	183.00	160.67

Sample Calculations:

1. Site-specific LFG Heat Content

$$\text{Standard CH4 heat content} = 1000 \text{ Btu/scf}$$

$$\text{LFG Heat Content (Btu/scf)} = \text{CH4 Content of LFG (\%)} * \text{CH4 Heat Content (Btu/scf)}$$

2. CH4 Flow to Device

$$\text{CH4 Flow to Device (MMScf)} = \text{CH4 Content (\%)} * \text{LFG Flow to Device (MMscf)}$$

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

$$\text{Normalized LFG Flow to Device (MMScf)} = \text{Site-specific LFG flow (MMscf)} * \text{Site-specific CH4 Content (\%)} / \text{Standard CH4 Content (50\%)}$$

Calculation Constants	
298	deg K
32	g/gmol
64	g/gmol
8.21E-05	m ³ - atm/gmol · K
35.31	ft ³ /m ³
453.6	g/lb
86.18	g/gmol

Default temperature of LFG, 25 deg C, AP-42 Section 2.4
 MW of total reduced sulfur (TRS)
 MW of SO2
 Ideal gas constant
 conversion factor
 MW of VOC as Hexane (AP-42 Table 2.4-2)

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
GE Jenbacher Engine	NOx	2.6	lb/hr	Emissions test data (2/18/2016)
GE Jenbacher Engine	CO	5.82	lb/hr	Emissions test data (2/18/2016)
GE Jenbacher Engine	VOC	0.0046	lb/hr	Emissions test data (2/18/2016)
GE Jenbacher Engine	TPM	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
GE Jenbacher Engine	TPM10	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
GE Jenbacher Engine	TPM2.5	15	lb/MMdscf CH4	AP-42 Table 2.4-4 (10/08)
GE Jenbacher Engine	FPM	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
GE Jenbacher Engine	FPM10	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
GE Jenbacher Engine	FPM2.5	3.75	lb/MMdscf CH4	Historical calculations; FPM/TPM = 0.25, AP-42 Table 1.4-2
GE Jenbacher Engine	CPM	11.25	lb/MMdscf CH4	Historical calculations; CPM/TPM = 0.75, AP-42 Table 1.4-2
GE Jenbacher Engine	SO2	0.58	lb/MMdscf LFG	TRS concentration in LFG; AP-42 Section 2.4, equations 3 and 4
GE Jenbacher Engine	CH4	Mass Balance		
GE Jenbacher Engine	CO2	Mass Balance		
GE Jenbacher Engine	N2O	6.30E-04	kg/MMBtu	40 CFR 98 Table C-2

Criteria Pollutant Emissions Summary
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2016

Device: **Landfill Gas Flare System**

Pollutant	Actual Emissions		Emissions Basis	TOSD*
	TPY	lb/day		
NOx	1.81	9.90	Manufacturer Data	10.56
CO	4.52	24.74	Manufacturer Data	-
VOC	0.06	0.33	AP-42, manuf control eff.	0.14
TPM	0.34	1.86	AP-42	-
TPM10	0.34	1.86	AP-42	-
TPM2.5	0.34	1.86	AP-42	-
FPM	0.08	0.46	Historical calcs, AP-42	-
FPM10	0.08	0.46	Historical calcs, AP-42	-
FPM2.5	0.08	0.46	Historical calcs, AP-42	-
CPM	0.25	1.39	Historical calcs, AP-42	-
SO2	0.03	0.18	LFG test data, AP-42	-

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

Criteria Pollutant Emissions Summary
Northeast Maryland Waste Disposal Authority - Gude Landfill
Reporting Year: 2016

Device: **GE Jenbacher Engine**

Pollutant	Actual Emissions		Emissions Basis	TOSD*
	TPY	lb/day		
NOx	10.42	62.40	Test data	62.40
CO	23.33	139.68	Test data	-
VOC	0.02	0.11	Test data	0.11
TPM	0.49	2.91	AP-42	-
TPM10	0.49	2.91	AP-42	-
TPM2.5	0.49	2.91	AP-42	-
FPM	0.12	0.73	Historical calcs, AP-42	-
FPM10	0.12	0.73	Historical calcs, AP-42	-
FPM2.5	0.12	0.73	Historical calcs, AP-42	-
CPM	0.36	2.18	Historical calcs, AP-42	-
SO2	0.05	0.29	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: 2015

LEG Flow to Flare = 116.17 MMscf/yr
 Flare Operating Days = 365.00 days/yr
 Flare Operating Hours = 8760 hrs/yr

LEG Flow to JEN Engine = 166.65 MMscf/yr
 JEN Engine Operating Days = 334.04 days/yr
 JEN Engine Operating Hours = 8017.00 hrs/yr

Pollutant	Molecular Weight (g/mol)	Concentration (ppmv)	Flare Pollutant Inflow (lb/yr)	Flare Destruction Efficiency (%)	Flare Emissions		JEN Engine Pollutant Inflow (lb/yr)	JEN Engine Destruction Efficiency (%)	JEN Engine Emissions		Facility Total Emissions	
					(lb/day)	(ton/yr)			(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
1,1,1-Trichloroethane (Methyl chloroform)	133.4	0.04	2.6	98.0%	0.00	0	2.3	97.2%	0.00	0	0.00	0
1,1,2,2-Tetrachloroethane	167.85	0.06	3.0	98.0%	0.00	0	4.3	97.2%	0.00	0	0.00	0
1,1,2,3,4-Pentachloro-1,3-butadiene (Hexachlorobutadiene)	260.76	0.06	4.6	98.0%	0.00	0.00	5.7	97.2%	0.00	0.00	0.00	0.00
1,1,2-Trichloroethane	133.4	0.06	2.4	98.0%	0.00	0	3.4	97.2%	0.00	0	0.00	0
1,1-Dichloroethane (Ethylidene dichloride)	98.96	2.18	34.6	98.0%	0.00	0	49.7	97.2%	0.00	0	0.01	0
1,1-Dichloroethane (Methylene chloride)	98.94	0.06	1.7	98.0%	0.00	0	2.5	97.2%	0.00	0	0.00	0
1,2-Dichloroethane	181.45	0.06	3.2	98.0%	0.00	0	4.6	97.2%	0.00	0	0.00	0
1,2-Dichloroethane (Ethylene dichloride)	98.96	0.06	1.8	98.0%	0.00	0	2.5	97.2%	0.00	0	0.00	0
1,2-Dichloroethane (Propylene dichloride)	112.99	0.06	2.0	98.0%	0.00	0	2.9	97.2%	0.00	0	0.00	0
1,3-Dichloroethane (Vinyl chloride)	54.09	0.06	1.0	98.0%	0.00	0.00	1.4	97.2%	0.00	0.00	0.00	0.00
1,3-Dichloroethane	110.97	0.06	2.0	98.0%	0.00	0.00	2.8	97.2%	0.00	0.00	0.00	0.00
1,4-Dioxane (1,4-dioxylene dioxide)	147.02	0.04	1.7	98.0%	0.00	0	2.5	97.2%	0.00	0	0.00	0
2,2,4-Trimethylpentane	88.11	0.06	1.6	98.0%	0.00	0	2.2	97.2%	0.00	0	0.00	0
2,2,4-Trimethylpentane	114.23	0.06	2.0	98.0%	0.00	0	2.9	97.2%	0.00	0	0.00	0
2-Sulfolane (Methyl ethyl ketone)	72.11	1.27	27.1	98.0%	0.00	0	38.9	97.2%	0.00	0	0.00	0
4-Methyl-2-pentanone (Methyl isobutyl ketone)	100.16	0.06	1.8	98.0%	0.00	0	2.6	97.2%	0.00	0	0.00	0
Acetylene *	53.06	6.33	99.6	98.0%	0.01	0.00	142.8	97.2%	0.01	0.00	0.02	0.00
Alyl chloride (E-Chloro-1-propene)	76.52	0.06	1.4	98.0%	0.00	0	2.0	97.2%	0.00	0.00	0.00	0.00
Benzene	78.11	0.272	6.3	98.0%	0.00	0.00	9.0	97.2%	0.00	0.00	0.00	0.00
Bromomethane (Methyl bromide)	128.98	0.06	2.3	98.0%	0.00	0.00	3.2	97.2%	0.00	0.00	0.00	0.00
Bromomethane (Vinyl bromide)	94.94	0.06	1.7	98.0%	0.00	0.00	2.4	97.2%	0.00	0.00	0.00	0.00
Carbon disulfide	106.95	0.06	1.9	98.0%	0.00	0	2.7	97.2%	0.00	0	0.00	0
Carbon tetrachloride	76.14	0.06	1.4	98.0%	0.00	0	1.9	97.2%	0.00	0	0.00	0
Carbon tetrachloride	153.82	0.04	1.8	98.0%	0.00	0.00	2.6	97.2%	0.00	0.00	0.00	0.00
Carbon tetrachloride (Carbon oxysulfide) *	60.08	0.49	8.7	98.0%	0.00	0	12.5	97.2%	0.00	0	0.00	0
Chlorine *	35.45	42	441.4	n/a	n/a	n/a	633.2	n/a	n/a	n/a	n/a	n/a
Chlorobenzene	112.56	0.06	2.0	98.0%	0.00	0	2.9	97.2%	0.00	0	0.00	0
Chloroethane (Ethyl chloride)	64.51	0.208	4.0	98.0%	0.00	0.00	5.7	97.2%	0.00	0.00	0.00	0.00
Chloroethane (Methyl chloride)	50.49	0.06	0.9	98.0%	0.00	0.00	1.3	97.2%	0.00	0	0.00	0.00
Dichloromethane (Methylene chloride)	84.93	0.115	2.9	98.0%	0.00	0	4.2	97.2%	0.00	0	0.00	0
Ethylbenzene	106.17	0.868	27.1	98.0%	0.00	0	39.2	97.2%	0.00	0	0.00	0
Heachlorobutadiene	260.76	0.06	4.6	98.0%	0.00	0.00	6.7	97.2%	0.00	0.00	0.00	0.00
n-Hexane	86.18	0.78	19.9	98.0%	0.00	0	28.6	97.2%	0.00	0	0.00	0
Hydrochloric Acid *	36.46	42	454.0	0.0%	1.24	0.1	651.2	0.0%	1.95	0.1	3.19	0.2
Mercaptyl (Total) *	200.59	0.000292	0.0	0.0%	0.00	0.00	0.0	0.0%	0.00	0.00	0.00	0.00
Methyl tert-butyl ether (MTBE)	88.15	0.084	2.2	98.0%	0.00	0	3.1	97.2%	0.00	0	0.00	0
Styrene (Vinylbenzene)	104.15	0.06	1.9	98.0%	0.00	0	2.7	97.2%	0.00	0	0.00	0
Tetrachloroethylene (Perchloroethylene)	165.83	0.265	13.0	98.0%	0.00	0	18.7	97.2%	0.00	0	0.00	0
Toluene (Methyl benzene)	92.14	4.16	113.6	98.0%	0.01	0	163.0	97.2%	0.01	0	0.02	0
Tri bromomethane (Bromoform)	252.73	0.04	3.0	98.0%	0.00	0.00	4.3	97.2%	0.00	0.00	0.00	0.00
Trichloroethylene (Trichloroethene)	131.39	0.158	6.2	98.0%	0.00	0	8.8	97.2%	0.00	0	0.00	0
Trichloromethane (Chloroform)	119.38	0.04	1.4	98.0%	0.00	0.00	2.0	97.2%	0.00	0	0.00	0.00
Vinyl acetate	86.09	0.06	1.5	98.0%	0.00	0	2.2	97.2%	0.00	0	0.00	0
Vinyl chloride (Chloroethene)	62.5	1.78	33.0	98.0%	0.00	0.00	47.3	97.2%	0.00	0.00	0.01	0.00
Xylenes (o-, m-, p- mixtures)	106.17	0.39	12.3	98.0%	0.00	0	17.6	97.2%	0.00	0	0.00	0
Total Air Toxics					1.27	0.10			2.01	0.10	3.28	0.10

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

Pollutant Inflow (lb/yr) = Conc (ppmv) / 1000 * MW (g/mol) / 35.21E-05

(lbm-m3) (gmol-K) / 298 K / 35.3 (ft3/m3) / 453.6 (lb) = 10^6

Greenhouse Gas Emissions

Northeast Maryland Waste Disposal Authority - Gude Landfill

Reporting Year: 2016

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	JEN Engine
Site-specific CO2 Content of LFG	%	29.1%	29.5%
Site-specific CH4 Content of LFG	%	38.9%	38.9%
Site-specific LFG heat content	Btu/scf	388.7	388.7
LFG Flow to Device	MMscf/yr	116.17	166.65
Days of Operation	Days/Yr	365.00	334.04
Hours of Operation	Hrs/Yr	8760.00	8017.00
Destruction Efficiency	%	98.0%	97.2%
Volume of CO2 Emissions	MMscf/yr	78.93	113.92
Mass of CO2 Emissions	TPY	4435.0	6401.2
	lb/day	24301.6	38326.0
	lb/hr	1012.6	1596.9
Volume of CH4 Emissions	MMscf/yr	0.903	1.814
Mass of CH4 Emissions	TPY	18.5	37.2
	lb/day	101.4	222.4
	lb/hr	4.2	9.3
Mass of N2O Emissions	TPY	0.03	0.04
	lb/day	0.17	0.27
	lb/hr	0.01	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 and engines.

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