



State of Oregon
Department of
Environmental
Quality

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Landfill Gas Emissions Rulemaking 2021 Rule Compilation Summary

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The Landfill Gas Emissions rulemaking will limit and reduce greenhouse gas emissions from landfills in Oregon. DEQ developed one set of Air Quality draft rules regarding greenhouse gas emissions from landfills.

DEQ reviewed existing landfill gas emission rules in adjacent states. With the exception of California, adjacent states have landfill gas emission rules based on the federal standards. California has state-specific Landfill Methane Regulations (LMRs). DEQ prepared the draft rules by combining the most stringent standards and required operational standards from the (LMRs), existing federal New Source Performance Standards (NSPS), existing federal National Emission Standards for Hazardous Air Pollutants (NESHAP), and existing federal Emission Guidelines (EGs). The majority of the draft rules are based on the California LMRs. Modifications to the California LMRs that DEQ is proposing are summarized in the table below.

Proposed Oregon specific modifications to California Rules	Reasoning	Proposed Rule Number in Division 239
DEQ proposes to not exclude landfills that received only construction and demolition waste. The California rules specifically exclude these landfills assuming that the materials in these landfills do not generate greenhouse gas. DEQ has found that components of construction and demolition debris in Oregon do generate greenhouse gas.	DEQ has found that components of construction and demolition debris in Oregon do generate greenhouse gas.	0010
Instead of using the landfill heat input capacity of 3.0 MM BTU/hr, DEQ proposes to use 664 metric tons per year. These results are quantitatively equivalent but using units of metric tons per year result requires regulated facilities to make fewer conversions.	Simplify calculation requirements for regulated entities	0105(2) and throughout
DEQ added a maximum methane generation rate that, when exceeded, requires the landfill owner or operator to install a landfill gas collection and control system (GCCS) and does not allow surface emission monitoring to exempt a landfill from installing GCCS.	Aligns with NESHAPs	0105(4)
DEQ proposes allowing open flare use for small amounts landfill gas that the gas control system cannot process. Limits the amount of landfill gas going to open flares in this situation to 664 metric tons per year	Allow flexibility in landfill gas controls.	0110(2)(c)(D)(iii)
Notification of a temporary shutdown of the GCCS	Align with standard	0110(5)(c)

	practices in Oregon.	
DEQ proposes to allow wellhead temperature of 62.8 degrees Celsius (145 degrees Fahrenheit). This is higher than the California regulations. DEQ proposes to require enhanced monitoring as a result of higher wellhead temperatures	Aligns with NESHAPs	0200(3) 0600(3)(E)
DEQ has added a requirement to conduct SEM after shutdown of the GCCS. Landfill gas rates can rebound after removal of a gas control system; DEQ recommends monitoring the surface emissions and corrective actions for emissions above a threshold to prevent significant emissions.	Based on recommendations from engineers in DEQ's Materials Management Program	0400(2)
DEQ proposes to use methane generation rate calculations included in EPA's Greenhouse Gas Reporting Program regulations. These calculations allow input of various waste compositions and spreadsheets are available to assist with these calculations.	These calculations allow input of various waste compositions and spreadsheets are available to assist with these calculations.	0800(2) and throughout

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.