



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

APR 29 2009

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Cliff Koenig  
HDR Engineering Incorporated  
200 West Forsyth St., Suite 800  
Jacksonville, Florida 32202-4321

Dear Mr. Koenig:

In your April 9, 2009, correspondence, you asked permission to use an alternative test procedure to determine nonmethane organic compounds (NMOC) from the Twin Chimneys Landfill in Greenville, South Carolina. The landfill is subject to 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, and must test to determine if its NMOC emissions are greater than 50 megagrams per year.

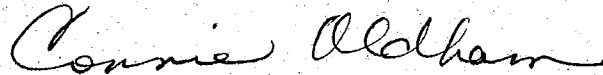
The Unit 1, Cell 1 area of the landfill contains waste older than two years and is approximately 4.3 hectares. This site has 11 leachate cleanouts, and you propose to collect samples there in place of subsurface sampling with Method 25C probes. Under Tier II of Subpart WWW, two Method 25C samples are collected per hectare of landfill area for determining NMOC. You submitted your leachate system design in a fax on April 23, 2009. This showed the sampling points at the above-ground ends of inclined cleanout risers.

This proposal to use the 11 leachate vents to collect NMOC samples is acceptable for Tier II testing at the Twin Chimneys Landfill in Greenville, South Carolina. We believe this testing alternative will produce samples that are at least as representative as those taken from Method 25C probes. All other test provisions detailed in your request fulfill the prescribed testing procedures in Methods 3C and 25C.

Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him at [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Conniesue B. Oldham".

Conniesue B. Oldham, Ph.D., Group Leader  
Measurement Technology Group

cc: Foston Curtis (E143-02)  
David McNeal, Region IV  
Melissa Poage, SC DHEC