



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

JAN 08 2008

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Michael J. Miller  
Aquaterra Environmental Solutions, Inc.  
3738 S. 149<sup>th</sup> Street, Suite 107  
Omaha, NE 68144-5564

Dear Mr. Miller:

In a June 19, 2007 letter, we approved your request to use alternative testing procedures at the Grand Island Landfill. The letter granted approval to use the alternative procedures specifically at that facility. We are reissuing the letter to make the approval applicable to facilities industry-wide.

In your request, you asked permission to use two modifications to Method 25C to collect nonmethane organic compounds from the Grand Island Regional Landfill to determine compliance with 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. You desire to use a Geoprobe brand sampling probe that is pushed into the test location and withdrawn to create a sampling void. Polyethylene tubing will be inserted into the probe to deliver the sample to the purge and sampling train. You propose to regulate the sample flow rate with a critical orifice flow controller that has been prepared to regulate a constant flow rate of 100 ml/minute. These modifications to Method 25C are discussed in a document entitled "Work Plan for Tier II NMOC Landfill Gas Testing, Grand Island Regional Landfill, City of Grand Island, Nebraska, June 2007, Project No. 2291.10." Your use of the noted modifications to Method 25C is acceptable because they neither change nor diminish the integrity of the sampling system. Since this alternative method is applicable to other 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  
Measurements Technology Group

cc: Foston Curtis (E143-02)  
Brad Parcheil, Nebraska DEQ  
Scott Postma, Region 7