Michael J. Miller
Aquaterra Environmental Solutions, Inc.
3738 S. 149th 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location and withdrawn to create a sampling void.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/approal.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.

Sincerely,

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

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