

**From:** [Langman, Michael](#)  
**To:** [Morgan, Dave \(EGLE\)](#); [Brunner, Julie \(EGLE\)](#); [Hollenbach, Heidi \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)  
**Cc:** [Blathras, Constantine](#); [Lim, YeChan](#); [Damico, Genevieve](#)  
**Subject:** Pitsch Sanitary Landfill - MI-ROP-N5619-2020b - Comments  
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Hi all,

I have finished reviewing the draft ROP reopening for Pitsch Sanitary Landfill, permit number MI-ROP-N5619-2020b. My comments are included below.

1. Appendix 5, Tier 4, Section (A): We recommend adding "at least" before 6,570 hours. This makes the incorporated language more consistent with 40 CFR 62.16718(a)(6)(viii) (A).
2. Appendix 7, equation 1: The index of summation included in the argument of the exponential function should be included as a subscript (e.g.,  $e^{(-kt_j)}$ ).
3. Appendix 7, Tier 2: The final paragraph of the section incorporates 40 CFR 62.16718(a)(3)(iv)(A) and (B) but does not include the option to conduct a SEM demonstration using the tier 4 procedures as allowed in 40 CFR 62.16718(a)(3)(iv)(C). We recommend including the option to conduct a SEM demonstration using the tier 4 procedures.
4. Appendix 7, tier 3: The first paragraph of this section refers to the tier 4 procedures as included in Appendix 5 of the draft permit instead of 40 CFR Part 62 Subpart OOO. We recommend citing 40 CFR 62.16718(a)(6) within this section of the appendix for further consistency with the Federal plan.
5. Appendix 7, "Calculating expected gas generation flow rates from the landfill": The first paragraph of this section states that USEPA Region V may approve site-specific factors. While this may be true in practice, we recommend referring to the Administrator for consistency with both the Federal plan requirements at 40 CFR 62.16720(a)(1) and the other references to the Administrator already proposed within the draft permit.
6. Appendix 7, Equations 5 and 6: Equations 5 and 6 appear to be missing from the draft permit. We recommend adding the equations to the permit.

Please let me know if you have any questions.

Thanks,  
Michael Langman  
Physical Scientist  
Air Permits Section, US EPA Region 5  
Email: [langman.michael@epa.gov](mailto:langman.michael@epa.gov)

Phone: 312-886-6867