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February 14, 2025 #4D24381

Colorado Department of Public Health and Environment
Air Pollution Control Division
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530
cdphe_apcdreports@state.co.us

RE: Milner Landfill 2025 Non-Methane Organic Compound Emissions Report
Operating Permit No. 09OPRO329

On behalf of Twin Landfill Corporation, Souder, Miller & Associates (SMA) is pleased to submit the Non-Methane Organic Compound (NMOC) Emissions Report for 2025 for the Milner Landfill. The NMOC Emissions Report is completed in accordance with the facility's Operating Permit. The Environmental Protection Agency's (EPA) "Landfill Gas Emissions Model" (LandGEM) version 3.03 was used to calculate the emissions. LandGEM is designed to calculate the current year's emissions based on the previous year's waste acceptance data. This report provides the NMOC emission rate for 2025, which was calculated using waste acceptance data for 2024.

The estimated **2025 NMOC emission rate is 8.822 Mg/year**. A "k" value of 0.02 was used based on the dry climate (per Section II, Condition 2.6.7 of the Operating Permit). The EPA default value for L_0 (170 m^3/Mg) was used. Calculations were completed using the C_{NMOC} results from the Tier 2 sampling event conducted in 2022 (C_{NMOC} = 205 ppmv).

The calculated emissions for NMOC are **below the 34 Mg/year threshold** set by the New Source Performance Standards (NSPS) Subpart XXX for installing a gas collection and control system.

If you have any questions, please feel free to contact us.

Sincerely,

MILLER ENGINEERS, INC. d/b/a
SOUDER, MILLER & ASSOCIATES

Michael J. Pretti

Michael J. Pretti, P.E.
Principal

Enc: 2025 NMOC Emissions Report for the Milner Landfill

XC: Lacie Coupe, Twin Landfill Corporation

APPENDIX A

LandGEM Results

Summary Report

Landfill Name or Identifier: Milner Landfill

Date: Tuesday, February 11, 2025

Description/Comments:

About LandGEM:

First-Order Decomposition Rate Equation:

$$Q_{CH_4} = \sum_{i=1}^{n} \sum_{j=0.1}^{1} kL_o \left(\frac{M_i}{10} \right) e^{-kt_{ij}}$$

Where,

Q_{CH4} = annual methane generation in the year of the calculation ($m^3/year$)

i = 1-year time increment

n = (year of the calculation) - (initial year of waste acceptance)

j = 0.1-year time increment

k = methane generation rate ($year^{-1}$)

L_0 = potential methane generation capacity (m^3/Mg)

M_i = mass of waste accepted in the i^{th} year (Mg)

t_{ij} = age of the j^{th} section of waste mass M_i accepted in the i^{th} year (*decimal years*, e.g., 3.2 years)

LandGEM is based on a first-order decomposition rate equation for quantifying emissions from the decomposition of landfilled waste in municipal solid waste (MSW) landfills. The software provides a relatively simple approach to estimating landfill gas emissions. Model defaults are based on empirical data from U.S. landfills. Field test data can also be used in place of model defaults when available. Further guidance on EPA test methods, Clean Air Act (CAA) regulations, and other guidance regarding landfill gas emissions and control technology requirements can be found at http://www.epa.gov/ttnatw01/landfill/landflpg.html.

LandGEM is considered a screening tool — the better the input data, the better the estimates. Often, there are limitations with the available data regarding waste quantity and composition, variation in design and operating practices over time, and changes occurring over time that impact the emissions potential. Changes to landfill operation, such as operating under wet conditions through leachate recirculation or other liquid additions, will result in generating more gas at a faster rate. Defaults for estimating emissions for this type of operation are being developed to include in LandGEM along with defaults for convential landfills (no leachate or liquid additions) for developing emission inventories and determining CAA applicability. Refer to the Web site identified above for future updates.

Input Review

The 80-year waste acceptance limit of the model has been exceeded before the Waste Design Capacity was reached. The model will assume the 80th year of waste acceptance as the final year to estimate emissions. See Section 2.6 of the User's Manual.

LANDFILL CHARACTERISTICS

Landfill Open Year	**1983**	
Landfill Closure Year (with 80-year limit)	**2062**	
Actual Closure Year (without limit)	***2064***	
Have Model Calculate Closure Year?	**Yes**	
Waste Design Capacity	**4,430,967**	*megagrams*

MODEL PARAMETERS

Methane Generation Rate, k	**0.020**	*year $^{-1}$*
Potential Methane Generation Capacity, L_0	**170**	*m^3/Mg*
NMOC Concentration	**205**	*ppmv as hexane*
Methane Content	**50**	*% by volume*

GASES / POLLUTANTS SELECTED

Gas / Pollutant #1:	**NMOC**
Gas / Pollutant #2:	**Carbon monoxide**
Gas / Pollutant #3:	**Total landfill gas**
Gas / Pollutant #4:	**Methane**

WASTE ACCEPTANCE RATES

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	*(short tons/year)*	*(Mg)*	*(short tons)*
1983	266,715	293,387	0	0
1984	34,380	37,818	266,715	293,387
1985	32,420	35,662	301,095	331,204
1986	26,892	29,582	333,514	366,866
1987	25,588	28,147	360,407	396,448
1988	32,352	35,587	385,995	424,595
1989	34,024	37,426	418,347	460,182
1990	34,138	37,551	452,371	497,608
1991	32,095	35,304	486,509	535,159
1992	35,123	38,635	518,603	570,464
1993	43,107	47,418	553,726	609,099
1994	49,054	53,959	596,833	656,516
1995	55,279	60,807	645,887	710,476
1996	52,691	57,961	701,166	771,283
1997	57,681	63,449	753,858	829,243
1998	64,293	70,723	811,538	892,692
1999	68,484	75,332	875,832	963,415
2000	67,591	74,350	944,315	1,038,747
2001	81,224	89,346	1,011,906	1,113,097
2002	74,315	81,747	1,093,130	1,202,443
2003	67,407	74,147	1,167,445	1,284,190
2004	75,948	83,543	1,234,852	1,358,337
2005	80,247	88,272	1,310,800	1,441,880
2006	117,714	129,485	1,391,047	1,530,152
2007	118,276	130,104	1,508,761	1,659,637
2008	99,931	109,925	1,627,037	1,789,741
2009	85,121	93,633	1,726,969	1,899,665
2010	72,960	80,256	1,812,089	1,993,298
2011	69,376	76,313	1,885,049	2,073,554
2012	38,087	41,896	1,954,425	2,149,867
2013	49,334	54,267	1,992,512	2,191,763
2014	48,448	53,293	2,041,846	2,246,030
2015	50,545	55,600	2,090,294	2,299,323
2016	52,139	57,353	2,140,839	2,354,923
2017	54,407	59,848	2,192,978	2,412,276
2018	69,082	75,990	2,247,385	2,472,123
2019	67,432	74,175	2,316,467	2,548,113
2020	43,146	47,461	2,383,899	2,622,289
2021	47,151	51,866	2,427,045	2,669,749
2022	50,867	55,954	2,474,196	2,721,615

WASTE ACCEPTANCE RATES (Continued)

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	*(short tons/year)*	*(Mg)*	*(short tons)*
2023	54,185	59,604	2,525,063	2,777,569
2024	45,964	50,560	2,579,248	2,837,173
2025	45,964	50,560	2,625,212	2,887,733
2026	45,964	50,560	2,671,176	2,938,293
2027	45,964	50,560	2,717,140	2,988,854
2028	45,964	50,560	2,763,104	3,039,414
2029	45,964	50,560	2,809,068	3,089,975
2030	45,964	50,560	2,855,032	3,140,535
2031	45,964	50,560	2,900,996	3,191,095
2032	45,964	50,560	2,946,960	3,241,656
2033	45,964	50,560	2,992,924	3,292,216
2034	45,964	50,560	3,038,888	3,342,777
2035	45,964	50,560	3,084,852	3,393,337
2036	45,964	50,560	3,130,816	3,443,897
2037	45,964	50,560	3,176,780	3,494,458
2038	45,964	50,560	3,222,744	3,545,018
2039	45,964	50,560	3,268,708	3,595,579
2040	45,964	50,560	3,314,672	3,646,139
2041	45,964	50,560	3,360,636	3,696,699
2042	45,964	50,560	3,406,600	3,747,260
2043	45,964	50,560	3,452,564	3,797,820
2044	45,964	50,560	3,498,528	3,848,381
2045	45,964	50,560	3,544,492	3,898,941
2046	45,964	50,560	3,590,456	3,949,501
2047	45,964	50,560	3,636,420	4,000,062
2048	45,964	50,560	3,682,384	4,050,622
2049	45,964	50,560	3,728,348	4,101,183
2050	45,964	50,560	3,774,312	4,151,743
2051	45,964	50,560	3,820,276	4,202,303
2052	45,964	50,560	3,866,240	4,252,864
2053	45,964	50,560	3,912,204	4,303,424
2054	45,964	50,560	3,958,168	4,353,985
2055	45,964	50,560	4,004,132	4,404,545
2056	45,964	50,560	4,050,096	4,455,105
2057	45,964	50,560	4,096,060	4,505,666
2058	45,964	50,560	4,142,024	4,556,226
2059	45,964	50,560	4,187,988	4,606,787
2060	45,964	50,560	4,233,952	4,657,347
2061	45,964	50,560	4,279,916	4,707,907
2062	45,964	50,560	4,325,880	4,758,468

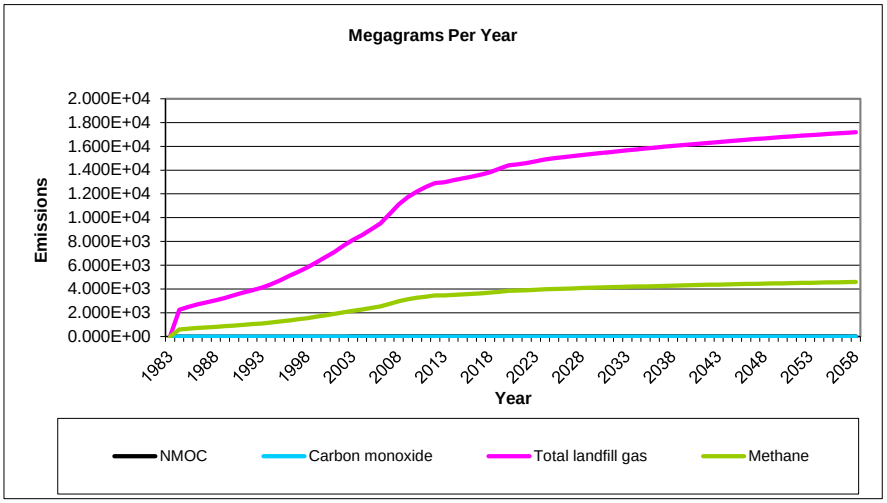
Pollutant Parameters

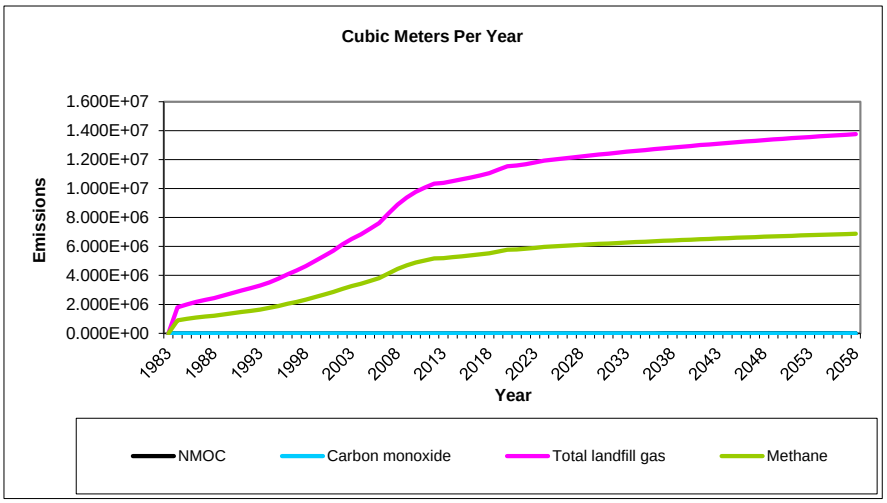
		Gas / Pollutant Default Parameters:		*User-specified Pollutant Parameters:*	
	Compound	Concentration (*ppmv*)	Molecular Weight	Concentration (*ppmv*)	Molecular Weight
Gases	Total landfill gas		0.00		
	Methane		16.04		
	Carbon dioxide		44.01		
	NMOC	4,000	86.18		
Pollutants	1,1,1-Trichloroethane (methyl chloroform) - HAP	0.48	133.41		
	1,1,2,2-Tetrachloroethane - HAP/VOC	1.1	167.85		
	1,1-Dichloroethane (ethylidene dichloride) - HAP/VOC	2.4	98.97		
	1,1-Dichloroethene (vinylidene chloride) - HAP/VOC	0.20	96.94		
	1,2-Dichloroethane (ethylene dichloride) - HAP/VOC	0.41	98.96		
	1,2-Dichloropropane (propylene dichloride) - HAP/VOC	0.18	112.99		
	2-Propanol (isopropyl alcohol) - VOC	50	60.11		
	Acetone	7.0	58.08		
	Acrylonitrile - HAP/VOC	6.3	53.06		
	Benzene - No or Unknown Co-disposal - HAP/VOC	1.9	78.11	11.00	
	Benzene - Co-disposal - HAP/VOC	11	78.11		
	Bromodichloromethane - VOC	3.1	163.83		
	Butane - VOC	5.0	58.12		
	Carbon disulfide - HAP/VOC	0.58	76.13		
	Carbon monoxide	140	28.01		
	Carbon tetrachloride - HAP/VOC	4.0E-03	153.84		
	Carbonyl sulfide - HAP/VOC	0.49	60.07		
	Chlorobenzene - HAP/VOC	0.25	112.56		
	Chlorodifluoromethane	1.3	86.47		
	Chloroethane (ethyl chloride) - HAP/VOC	1.3	64.52		
	Chloroform - HAP/VOC	0.03	119.39		
	Chloromethane - VOC	1.2	50.49		
	Dichlorobenzene - (HAP for para isomer/VOC)	0.21	147		
	Dichlorodifluoromethane	16	120.91		
	Dichlorofluoromethane - VOC	2.6	102.92		
	Dichloromethane (methylene chloride) - HAP	14	84.94		
	Dimethyl sulfide (methyl sulfide) - VOC	7.8	62.13		
	Ethane	890	30.07		
	Ethanol - VOC	27	46.08		

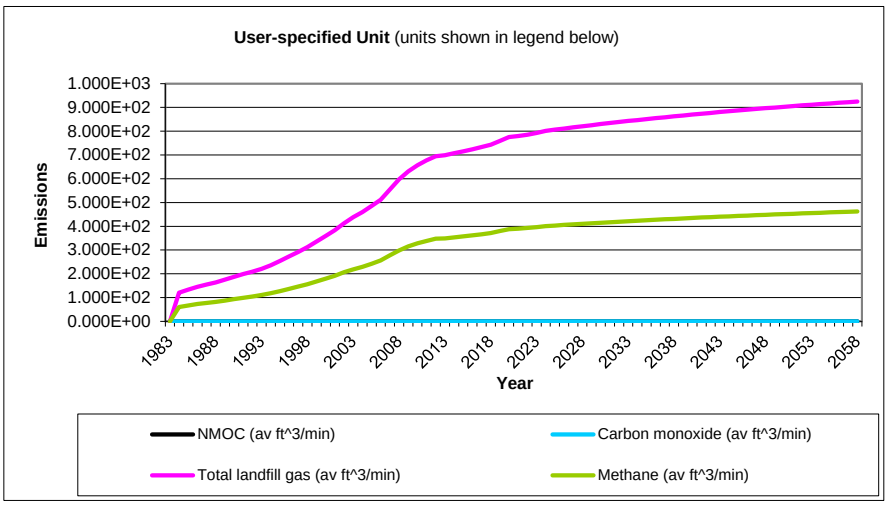
Pollutant Parameters (Continued)

		Gas / Pollutant Default Parameters:		*User-specified Pollutant Parameters:*	
	Compound	Concentration (*ppmv*)	Molecular Weight	Concentration (*ppmv*)	Molecular Weight
Pollutants	Ethyl mercaptan (ethanethiol) - VOC	2.3	62.13		
	Ethylbenzene - HAP/VOC	4.6	106.16		
	Ethylene dibromide - HAP/VOC	1.0E-03	187.88		
	Fluorotrichloromethane - VOC	0.76	137.38		
	Hexane - HAP/VOC	6.6	86.18		
	Hydrogen sulfide	36	34.08		
	Mercury (total) - HAP	2.9E-04	200.61		
	Methyl ethyl ketone - HAP/VOC	7.1	72.11		
	Methyl isobutyl ketone - HAP/VOC	1.9	100.16		
	Methyl mercaptan - VOC	2.5	48.11		
	Pentane - VOC	3.3	72.15		
	Perchloroethylene (tetrachloroethylene) - HAP	3.7	165.83		
	Propane - VOC	11	44.09		
	t-1,2-Dichloroethene - VOC	2.8	96.94		
	Toluene - No or Unknown Co-disposal - HAP/VOC	39	92.13	170.00	
	Toluene - Co-disposal - HAP/VOC	170	92.13		
	Trichloroethylene (trichloroethene) - HAP/VOC	2.8	131.40		
	Vinyl chloride - HAP/VOC	7.3	62.50		
	Xylenes - HAP/VOC	12	106.16		

Graphs


Megagrams Per Year
Emissions
2.000E+04
1.800E+04
1.600E+04
1.400E+04
1.200E+04
1.000E+04
8.000E+03
6.000E+03
4.000E+03
2.000E+03
0.000E+00
1983
1988
1993
1998
2003
2008
2013
2018
2023
2028
2033
2038
2043
2048
2053
2058
Year
NMOC
Carbon monoxide
Total landfill gas
Methane


Cubic Meters Per Year
Emissions
1.600E+07
1.400E+07
1.200E+07
1.000E+07
8.000E+06
6.000E+06
4.000E+06
2.000E+06
0.000E+00
1983
1988
1993
1998
2003
2008
2013
2018
2023
2028
2033
2038
2043
2048
2053
2058
Year
NMOC
Carbon monoxide
Total landfill gas
Methane


User-specified Unit (units shown in legend below)
Emissions
1.000E+03
9.000E+02
8.000E+02
7.000E+02
6.000E+02
5.000E+02
4.000E+02
3.000E+02
2.000E+02
1.000E+02
0.000E+00
1983
1988
1993
1998
2003
2008
2013
2018
2023
2028
2033
2038
2043
2048
2053
2058
Year
NMOC (av ft^3/min)
Carbon monoxide (av ft^3/min)
Total landfill gas (av ft^3/min)
Methane (av ft^3/min)

Results

Year	NMOC			Carbon monoxide		
	(Mg/year)	*(m^3/year)*	*(av ft^3/min)*	*(Mg/year)*	*(m^3/year)*	*(av ft^3/min)*
1983	0	0	0	0	0	0
1984	1.321E+00	3.685E+02	2.476E-02	2.932E-01	2.516E+02	1.691E-02
1985	1.465E+00	4.087E+02	2.746E-02	3.252E-01	2.791E+02	1.875E-02
1986	1.596E+00	4.454E+02	2.992E-02	3.543E-01	3.042E+02	2.044E-02
1987	1.698E+00	4.737E+02	3.183E-02	3.769E-01	3.235E+02	2.174E-02
1988	1.791E+00	4.997E+02	3.357E-02	3.976E-01	3.412E+02	2.293E-02
1989	1.916E+00	5.345E+02	3.591E-02	4.252E-01	3.650E+02	2.452E-02
1990	2.046E+00	5.709E+02	3.836E-02	4.542E-01	3.899E+02	2.620E-02
1991	2.175E+00	6.068E+02	4.077E-02	4.827E-01	4.144E+02	2.784E-02
1992	2.291E+00	6.391E+02	4.294E-02	5.085E-01	4.364E+02	2.932E-02
1993	2.419E+00	6.750E+02	4.535E-02	5.370E-01	4.609E+02	3.097E-02
1994	2.585E+00	7.211E+02	4.845E-02	5.738E-01	4.925E+02	3.309E-02
1995	2.777E+00	7.746E+02	5.205E-02	6.163E-01	5.290E+02	3.554E-02
1996	2.995E+00	8.357E+02	5.615E-02	6.649E-01	5.707E+02	3.834E-02
1997	3.197E+00	8.919E+02	5.993E-02	7.096E-01	6.091E+02	4.093E-02
1998	3.419E+00	9.539E+02	6.409E-02	7.590E-01	6.515E+02	4.377E-02
1999	3.670E+00	1.024E+03	6.879E-02	8.146E-01	6.992E+02	4.698E-02
2000	3.936E+00	1.098E+03	7.379E-02	8.738E-01	7.500E+02	5.039E-02
2001	4.193E+00	1.170E+03	7.860E-02	9.307E-01	7.989E+02	5.368E-02
2002	4.512E+00	1.259E+03	8.458E-02	1.002E+00	8.597E+02	5.777E-02
2003	4.791E+00	1.337E+03	8.981E-02	1.063E+00	9.128E+02	6.133E-02
2004	5.030E+00	1.403E+03	9.429E-02	1.116E+00	9.583E+02	6.439E-02
2005	5.307E+00	1.480E+03	9.947E-02	1.178E+00	1.011E+03	6.793E-02
2006	5.599E+00	1.562E+03	1.049E-01	1.243E+00	1.067E+03	7.167E-02
2007	6.071E+00	1.694E+03	1.138E-01	1.348E+00	1.157E+03	7.772E-02
2008	6.536E+00	1.824E+03	1.225E-01	1.451E+00	1.245E+03	8.367E-02
2009	6.902E+00	1.925E+03	1.294E-01	1.532E+00	1.315E+03	8.835E-02
2010	7.187E+00	2.005E+03	1.347E-01	1.595E+00	1.369E+03	9.200E-02
2011	7.406E+00	2.066E+03	1.388E-01	1.644E+00	1.411E+03	9.480E-02
2012	7.603E+00	2.121E+03	1.425E-01	1.687E+00	1.448E+03	9.732E-02
2013	7.641E+00	2.132E+03	1.432E-01	1.696E+00	1.456E+03	9.781E-02
2014	7.734E+00	2.158E+03	1.450E-01	1.717E+00	1.473E+03	9.900E-02
2015	7.820E+00	2.182E+03	1.466E-01	1.736E+00	1.490E+03	1.001E-01
2016	7.916E+00	2.208E+03	1.484E-01	1.757E+00	1.508E+03	1.013E-01
2017	8.017E+00	2.237E+03	1.503E-01	1.780E+00	1.528E+03	1.026E-01
2018	8.128E+00	2.268E+03	1.524E-01	1.804E+00	1.549E+03	1.040E-01
2019	8.309E+00	2.318E+03	1.558E-01	1.844E+00	1.583E+03	1.064E-01
2020	8.479E+00	2.365E+03	1.589E-01	1.882E+00	1.615E+03	1.085E-01
2021	8.524E+00	2.378E+03	1.598E-01	1.892E+00	1.624E+03	1.091E-01
2022	8.589E+00	2.396E+03	1.610E-01	1.906E+00	1.636E+03	1.100E-01
2023	8.671E+00	2.419E+03	1.625E-01	1.925E+00	1.652E+03	1.110E-01
2024	8.768E+00	2.446E+03	1.643E-01	1.946E+00	1.670E+03	1.122E-01
2025	8.822E+00	2.461E+03	1.654E-01	1.958E+00	1.681E+03	1.129E-01
2026	8.874E+00	2.476E+03	1.663E-01	1.970E+00	1.691E+03	1.136E-01
2027	8.926E+00	2.490E+03	1.673E-01	1.981E+00	1.701E+03	1.143E-01
2028	8.977E+00	2.504E+03	1.683E-01	1.993E+00	1.710E+03	1.149E-01
2029	9.027E+00	2.518E+03	1.692E-01	2.004E+00	1.720E+03	1.156E-01
2030	9.076E+00	2.532E+03	1.701E-01	2.015E+00	1.729E+03	1.162E-01
2031	9.124E+00	2.545E+03	1.710E-01	2.025E+00	1.738E+03	1.168E-01
2032	9.171E+00	2.558E+03	1.719E-01	2.036E+00	1.747E+03	1.174E-01

Results (Continued)

Year	NMOC			Carbon monoxide		
	(Mg/year)	*(m^3/year)*	*(av ft^3/min)*	*(Mg/year)*	*(m^3/year)*	*(av ft^3/min)*
2033	9.217E+00	2.571E+03	1.728E-01	2.046E+00	1.756E+03	1.180E-01
2034	9.262E+00	2.584E+03	1.736E-01	2.056E+00	1.765E+03	1.186E-01
2035	9.306E+00	2.596E+03	1.744E-01	2.066E+00	1.773E+03	1.191E-01
2036	9.349E+00	2.608E+03	1.753E-01	2.075E+00	1.781E+03	1.197E-01
2037	9.392E+00	2.620E+03	1.760E-01	2.085E+00	1.789E+03	1.202E-01
2038	9.434E+00	2.632E+03	1.768E-01	2.094E+00	1.797E+03	1.208E-01
2039	9.474E+00	2.643E+03	1.776E-01	2.103E+00	1.805E+03	1.213E-01
2040	9.514E+00	2.654E+03	1.783E-01	2.112E+00	1.813E+03	1.218E-01
2041	9.554E+00	2.665E+03	1.791E-01	2.121E+00	1.820E+03	1.223E-01
2042	9.592E+00	2.676E+03	1.798E-01	2.129E+00	1.828E+03	1.228E-01
2043	9.630E+00	2.687E+03	1.805E-01	2.137E+00	1.835E+03	1.233E-01
2044	9.667E+00	2.697E+03	1.812E-01	2.146E+00	1.842E+03	1.237E-01
2045	9.703E+00	2.707E+03	1.819E-01	2.154E+00	1.849E+03	1.242E-01
2046	9.738E+00	2.717E+03	1.825E-01	2.162E+00	1.855E+03	1.247E-01
2047	9.773E+00	2.727E+03	1.832E-01	2.169E+00	1.862E+03	1.251E-01
2048	9.807E+00	2.736E+03	1.838E-01	2.177E+00	1.869E+03	1.255E-01
2049	9.841E+00	2.745E+03	1.845E-01	2.184E+00	1.875E+03	1.260E-01
2050	9.873E+00	2.755E+03	1.851E-01	2.192E+00	1.881E+03	1.264E-01
2051	9.906E+00	2.763E+03	1.857E-01	2.199E+00	1.887E+03	1.268E-01
2052	9.937E+00	2.772E+03	1.863E-01	2.206E+00	1.893E+03	1.272E-01
2053	9.968E+00	2.781E+03	1.868E-01	2.213E+00	1.899E+03	1.276E-01
2054	9.998E+00	2.789E+03	1.874E-01	2.219E+00	1.905E+03	1.280E-01
2055	1.003E+01	2.798E+03	1.880E-01	2.226E+00	1.911E+03	1.284E-01
2056	1.006E+01	2.806E+03	1.885E-01	2.232E+00	1.916E+03	1.287E-01
2057	1.009E+01	2.814E+03	1.890E-01	2.239E+00	1.921E+03	1.291E-01
2058	1.011E+01	2.821E+03	1.896E-01	2.245E+00	1.927E+03	1.295E-01
2059	1.014E+01	2.829E+03	1.901E-01	2.251E+00	1.932E+03	1.298E-01
2060	1.017E+01	2.837E+03	1.906E-01	2.257E+00	1.937E+03	1.302E-01
2061	1.019E+01	2.844E+03	1.911E-01	2.263E+00	1.942E+03	1.305E-01
2062	1.022E+01	2.851E+03	1.916E-01	2.268E+00	1.947E+03	1.308E-01
2063	1.024E+01	2.858E+03	1.920E-01	2.274E+00	1.952E+03	1.311E-01
2064	1.004E+01	2.801E+03	1.882E-01	2.229E+00	1.913E+03	1.285E-01
2065	9.843E+00	2.746E+03	1.845E-01	2.185E+00	1.875E+03	1.260E-01
2066	9.648E+00	2.692E+03	1.809E-01	2.142E+00	1.838E+03	1.235E-01
2067	9.457E+00	2.638E+03	1.773E-01	2.099E+00	1.802E+03	1.211E-01
2068	9.270E+00	2.586E+03	1.738E-01	2.058E+00	1.766E+03	1.187E-01
2069	9.086E+00	2.535E+03	1.703E-01	2.017E+00	1.731E+03	1.163E-01
2070	8.906E+00	2.485E+03	1.669E-01	1.977E+00	1.697E+03	1.140E-01
2071	8.730E+00	2.435E+03	1.636E-01	1.938E+00	1.663E+03	1.118E-01
2072	8.557E+00	2.387E+03	1.604E-01	1.899E+00	1.630E+03	1.095E-01
2073	8.388E+00	2.340E+03	1.572E-01	1.862E+00	1.598E+03	1.074E-01
2074	8.222E+00	2.294E+03	1.541E-01	1.825E+00	1.566E+03	1.052E-01
2075	8.059E+00	2.248E+03	1.511E-01	1.789E+00	1.535E+03	1.032E-01
2076	7.899E+00	2.204E+03	1.481E-01	1.753E+00	1.505E+03	1.011E-01
2077	7.743E+00	2.160E+03	1.451E-01	1.719E+00	1.475E+03	9.912E-02
2078	7.589E+00	2.117E+03	1.423E-01	1.685E+00	1.446E+03	9.715E-02
2079	7.439E+00	2.075E+03	1.394E-01	1.651E+00	1.417E+03	9.523E-02
2080	7.292E+00	2.034E+03	1.367E-01	1.619E+00	1.389E+03	9.335E-02
2081	7.147E+00	1.994E+03	1.340E-01	1.586E+00	1.362E+03	9.150E-02
2082	7.006E+00	1.955E+03	1.313E-01	1.555E+00	1.335E+03	8.969E-02
2083	6.867E+00	1.916E+03	1.287E-01	1.524E+00	1.308E+03	8.791E-02

Results (Continued)

Year	NMOC			Carbon monoxide		
	(Mg/year)	*(m^3/year)*	*(av ft^3/min)*	*(Mg/year)*	*(m^3/year)*	*(av ft^3/min)*
2084	6.731E+00	1.878E+03	1.262E-01	1.494E+00	1.282E+03	8.617E-02
2085	6.598E+00	1.841E+03	1.237E-01	1.465E+00	1.257E+03	8.446E-02
2086	6.467E+00	1.804E+03	1.212E-01	1.436E+00	1.232E+03	8.279E-02
2087	6.339E+00	1.769E+03	1.188E-01	1.407E+00	1.208E+03	8.115E-02
2088	6.214E+00	1.734E+03	1.165E-01	1.379E+00	1.184E+03	7.954E-02
2089	6.091E+00	1.699E+03	1.142E-01	1.352E+00	1.160E+03	7.797E-02
2090	5.970E+00	1.666E+03	1.119E-01	1.325E+00	1.137E+03	7.642E-02
2091	5.852E+00	1.633E+03	1.097E-01	1.299E+00	1.115E+03	7.491E-02
2092	5.736E+00	1.600E+03	1.075E-01	1.273E+00	1.093E+03	7.343E-02
2093	5.622E+00	1.569E+03	1.054E-01	1.248E+00	1.071E+03	7.197E-02
2094	5.511E+00	1.537E+03	1.033E-01	1.223E+00	1.050E+03	7.055E-02
2095	5.402E+00	1.507E+03	1.013E-01	1.199E+00	1.029E+03	6.915E-02
2096	5.295E+00	1.477E+03	9.925E-02	1.175E+00	1.009E+03	6.778E-02
2097	5.190E+00	1.448E+03	9.729E-02	1.152E+00	9.888E+02	6.644E-02
2098	5.087E+00	1.419E+03	9.536E-02	1.129E+00	9.693E+02	6.512E-02
2099	4.987E+00	1.391E+03	9.347E-02	1.107E+00	9.501E+02	6.384E-02
2100	4.888E+00	1.364E+03	9.162E-02	1.085E+00	9.313E+02	6.257E-02
2101	4.791E+00	1.337E+03	8.981E-02	1.063E+00	9.128E+02	6.133E-02
2102	4.696E+00	1.310E+03	8.803E-02	1.042E+00	8.947E+02	6.012E-02
2103	4.603E+00	1.284E+03	8.629E-02	1.022E+00	8.770E+02	5.893E-02
2104	4.512E+00	1.259E+03	8.458E-02	1.002E+00	8.597E+02	5.776E-02
2105	4.423E+00	1.234E+03	8.290E-02	9.817E-01	8.426E+02	5.662E-02
2106	4.335E+00	1.209E+03	8.126E-02	9.622E-01	8.260E+02	5.550E-02
2107	4.249E+00	1.185E+03	7.965E-02	9.432E-01	8.096E+02	5.440E-02
2108	4.165E+00	1.162E+03	7.808E-02	9.245E-01	7.936E+02	5.332E-02
2109	4.083E+00	1.139E+03	7.653E-02	9.062E-01	7.779E+02	5.226E-02
2110	4.002E+00	1.116E+03	7.501E-02	8.883E-01	7.625E+02	5.123E-02
2111	3.923E+00	1.094E+03	7.353E-02	8.707E-01	7.474E+02	5.021E-02
2112	3.845E+00	1.073E+03	7.207E-02	8.534E-01	7.326E+02	4.922E-02
2113	3.769E+00	1.051E+03	7.065E-02	8.365E-01	7.181E+02	4.825E-02
2114	3.694E+00	1.031E+03	6.925E-02	8.200E-01	7.038E+02	4.729E-02
2115	3.621E+00	1.010E+03	6.788E-02	8.037E-01	6.899E+02	4.635E-02
2116	3.549E+00	9.902E+02	6.653E-02	7.878E-01	6.762E+02	4.544E-02
2117	3.479E+00	9.706E+02	6.521E-02	7.722E-01	6.628E+02	4.454E-02
2118	3.410E+00	9.514E+02	6.392E-02	7.569E-01	6.497E+02	4.365E-02
2119	3.343E+00	9.325E+02	6.266E-02	7.419E-01	6.369E+02	4.279E-02
2120	3.276E+00	9.141E+02	6.142E-02	7.273E-01	6.242E+02	4.194E-02
2121	3.212E+00	8.960E+02	6.020E-02	7.129E-01	6.119E+02	4.111E-02
2122	3.148E+00	8.782E+02	5.901E-02	6.987E-01	5.998E+02	4.030E-02
2123	3.086E+00	8.608E+02	5.784E-02	6.849E-01	5.879E+02	3.950E-02

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	*(m^3/year)*	*(av ft^3/min)*	*(Mg/year)*	*(m^3/year)*	*(av ft^3/min)*
1983	0	0	0	0	0	0
1984	2.245E+03	1.797E+06	1.208E+02	5.996E+02	8.987E+05	6.038E+01
1985	2.490E+03	1.994E+06	1.339E+02	6.650E+02	9.968E+05	6.697E+01
1986	2.713E+03	2.173E+06	1.460E+02	7.247E+02	1.086E+06	7.299E+01
1987	2.886E+03	2.311E+06	1.553E+02	7.708E+02	1.155E+06	7.763E+01
1988	3.044E+03	2.437E+06	1.638E+02	8.131E+02	1.219E+06	8.189E+01
1989	3.256E+03	2.607E+06	1.752E+02	8.697E+02	1.304E+06	8.759E+01
1990	3.478E+03	2.785E+06	1.871E+02	9.290E+02	1.392E+06	9.356E+01
1991	3.696E+03	2.960E+06	1.989E+02	9.873E+02	1.480E+06	9.943E+01
1992	3.893E+03	3.117E+06	2.095E+02	1.040E+03	1.559E+06	1.047E+02
1993	4.112E+03	3.292E+06	2.212E+02	1.098E+03	1.646E+06	1.106E+02
1994	4.393E+03	3.518E+06	2.364E+02	1.173E+03	1.759E+06	1.182E+02
1995	4.719E+03	3.779E+06	2.539E+02	1.260E+03	1.889E+06	1.269E+02
1996	5.091E+03	4.076E+06	2.739E+02	1.360E+03	2.038E+06	1.369E+02
1997	5.433E+03	4.351E+06	2.923E+02	1.451E+03	2.175E+06	1.462E+02
1998	5.811E+03	4.653E+06	3.127E+02	1.552E+03	2.327E+06	1.563E+02
1999	6.237E+03	4.994E+06	3.356E+02	1.666E+03	2.497E+06	1.678E+02
2000	6.690E+03	5.357E+06	3.599E+02	1.787E+03	2.679E+06	1.800E+02
2001	7.126E+03	5.707E+06	3.834E+02	1.904E+03	2.853E+06	1.917E+02
2002	7.669E+03	6.141E+06	4.126E+02	2.048E+03	3.070E+06	2.063E+02
2003	8.143E+03	6.520E+06	4.381E+02	2.175E+03	3.260E+06	2.190E+02
2004	8.549E+03	6.845E+06	4.599E+02	2.283E+03	3.423E+06	2.300E+02
2005	9.019E+03	7.222E+06	4.852E+02	2.409E+03	3.611E+06	2.426E+02
2006	9.515E+03	7.619E+06	5.119E+02	2.542E+03	3.810E+06	2.560E+02
2007	1.032E+04	8.262E+06	5.551E+02	2.756E+03	4.131E+06	2.776E+02
2008	1.111E+04	8.895E+06	5.977E+02	2.967E+03	4.448E+06	2.988E+02
2009	1.173E+04	9.393E+06	6.311E+02	3.133E+03	4.696E+06	3.155E+02
2010	1.221E+04	9.780E+06	6.571E+02	3.262E+03	4.890E+06	3.286E+02
2011	1.259E+04	1.008E+07	6.772E+02	3.362E+03	5.039E+06	3.386E+02
2012	1.292E+04	1.035E+07	6.952E+02	3.451E+03	5.173E+06	3.476E+02
2013	1.299E+04	1.040E+07	6.986E+02	3.469E+03	5.199E+06	3.493E+02
2014	1.314E+04	1.052E+07	7.072E+02	3.511E+03	5.262E+06	3.536E+02
2015	1.329E+04	1.064E+07	7.151E+02	3.550E+03	5.321E+06	3.575E+02
2016	1.345E+04	1.077E+07	7.238E+02	3.593E+03	5.386E+06	3.619E+02
2017	1.363E+04	1.091E+07	7.331E+02	3.640E+03	5.455E+06	3.665E+02
2018	1.381E+04	1.106E+07	7.432E+02	3.690E+03	5.531E+06	3.716E+02
2019	1.412E+04	1.131E+07	7.598E+02	3.772E+03	5.654E+06	3.799E+02
2020	1.441E+04	1.154E+07	7.753E+02	3.849E+03	5.769E+06	3.876E+02
2021	1.449E+04	1.160E+07	7.794E+02	3.870E+03	5.800E+06	3.897E+02
2022	1.460E+04	1.169E+07	7.854E+02	3.899E+03	5.844E+06	3.927E+02
2023	1.474E+04	1.180E+07	7.928E+02	3.936E+03	5.900E+06	3.964E+02
2024	1.490E+04	1.193E+07	8.017E+02	3.980E+03	5.966E+06	4.008E+02
2025	1.499E+04	1.201E+07	8.066E+02	4.005E+03	6.003E+06	4.033E+02
2026	1.508E+04	1.208E+07	8.115E+02	4.029E+03	6.039E+06	4.057E+02
2027	1.517E+04	1.215E+07	8.162E+02	4.052E+03	6.074E+06	4.081E+02
2028	1.526E+04	1.222E+07	8.209E+02	4.075E+03	6.108E+06	4.104E+02
2029	1.534E+04	1.228E+07	8.254E+02	4.098E+03	6.142E+06	4.127E+02
2030	1.542E+04	1.235E+07	8.299E+02	4.120E+03	6.176E+06	4.149E+02
2031	1.551E+04	1.242E+07	8.343E+02	4.142E+03	6.208E+06	4.171E+02
2032	1.559E+04	1.248E+07	8.386E+02	4.163E+03	6.240E+06	4.193E+02

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	*(m^3/year)*	*(av ft^3/min)*	*(Mg/year)*	*(m^3/year)*	*(av ft^3/min)*
2033	1.566E+04	1.254E+07	8.428E+02	4.184E+03	6.272E+06	4.214E+02
2034	1.574E+04	1.260E+07	8.469E+02	4.205E+03	6.302E+06	4.234E+02
2035	1.582E+04	1.266E+07	8.509E+02	4.225E+03	6.332E+06	4.255E+02
2036	1.589E+04	1.272E+07	8.549E+02	4.244E+03	6.362E+06	4.274E+02
2037	1.596E+04	1.278E+07	8.588E+02	4.264E+03	6.391E+06	4.294E+02
2038	1.603E+04	1.284E+07	8.626E+02	4.282E+03	6.419E+06	4.313E+02
2039	1.610E+04	1.289E+07	8.663E+02	4.301E+03	6.447E+06	4.332E+02
2040	1.617E+04	1.295E+07	8.700E+02	4.319E+03	6.474E+06	4.350E+02
2041	1.624E+04	1.300E+07	8.736E+02	4.337E+03	6.501E+06	4.368E+02
2042	1.630E+04	1.305E+07	8.771E+02	4.354E+03	6.527E+06	4.385E+02
2043	1.637E+04	1.311E+07	8.805E+02	4.371E+03	6.553E+06	4.403E+02
2044	1.643E+04	1.316E+07	8.839E+02	4.388E+03	6.578E+06	4.420E+02
2045	1.649E+04	1.320E+07	8.872E+02	4.405E+03	6.602E+06	4.436E+02
2046	1.655E+04	1.325E+07	8.905E+02	4.421E+03	6.626E+06	4.452E+02
2047	1.661E+04	1.330E+07	8.936E+02	4.437E+03	6.650E+06	4.468E+02
2048	1.667E+04	1.335E+07	8.968E+02	4.452E+03	6.673E+06	4.484E+02
2049	1.672E+04	1.339E+07	8.998E+02	4.467E+03	6.696E+06	4.499E+02
2050	1.678E+04	1.344E+07	9.028E+02	4.482E+03	6.718E+06	4.514E+02
2051	1.683E+04	1.348E+07	9.057E+02	4.497E+03	6.740E+06	4.529E+02
2052	1.689E+04	1.352E+07	9.086E+02	4.511E+03	6.762E+06	4.543E+02
2053	1.694E+04	1.357E+07	9.114E+02	4.525E+03	6.783E+06	4.557E+02
2054	1.699E+04	1.361E+07	9.142E+02	4.539E+03	6.803E+06	4.571E+02
2055	1.704E+04	1.365E+07	9.169E+02	4.552E+03	6.823E+06	4.585E+02
2056	1.709E+04	1.369E+07	9.196E+02	4.565E+03	6.843E+06	4.598E+02
2057	1.714E+04	1.372E+07	9.222E+02	4.578E+03	6.862E+06	4.611E+02
2058	1.719E+04	1.376E+07	9.247E+02	4.591E+03	6.881E+06	4.624E+02
2059	1.723E+04	1.380E+07	9.272E+02	4.603E+03	6.900E+06	4.636E+02
2060	1.728E+04	1.384E+07	9.297E+02	4.616E+03	6.918E+06	4.648E+02
2061	1.732E+04	1.387E+07	9.321E+02	4.627E+03	6.936E+06	4.660E+02
2062	1.737E+04	1.391E+07	9.344E+02	4.639E+03	6.954E+06	4.672E+02
2063	1.741E+04	1.394E+07	9.368E+02	4.651E+03	6.971E+06	4.684E+02
2064	1.707E+04	1.367E+07	9.182E+02	4.559E+03	6.833E+06	4.591E+02
2065	1.673E+04	1.340E+07	9.000E+02	4.468E+03	6.698E+06	4.500E+02
2066	1.640E+04	1.313E+07	8.822E+02	4.380E+03	6.565E+06	4.411E+02
2067	1.607E+04	1.287E+07	8.647E+02	4.293E+03	6.435E+06	4.324E+02
2068	1.575E+04	1.262E+07	8.476E+02	4.208E+03	6.308E+06	4.238E+02
2069	1.544E+04	1.237E+07	8.308E+02	4.125E+03	6.183E+06	4.154E+02
2070	1.514E+04	1.212E+07	8.144E+02	4.043E+03	6.060E+06	4.072E+02
2071	1.484E+04	1.188E+07	7.982E+02	3.963E+03	5.940E+06	3.991E+02
2072	1.454E+04	1.165E+07	7.824E+02	3.885E+03	5.823E+06	3.912E+02
2073	1.425E+04	1.141E+07	7.669E+02	3.808E+03	5.707E+06	3.835E+02
2074	1.397E+04	1.119E+07	7.518E+02	3.732E+03	5.594E+06	3.759E+02
2075	1.370E+04	1.097E+07	7.369E+02	3.658E+03	5.484E+06	3.684E+02
2076	1.342E+04	1.075E+07	7.223E+02	3.586E+03	5.375E+06	3.611E+02
2077	1.316E+04	1.054E+07	7.080E+02	3.515E+03	5.269E+06	3.540E+02
2078	1.290E+04	1.033E+07	6.940E+02	3.445E+03	5.164E+06	3.470E+02
2079	1.264E+04	1.012E+07	6.802E+02	3.377E+03	5.062E+06	3.401E+02
2080	1.239E+04	9.923E+06	6.668E+02	3.310E+03	4.962E+06	3.334E+02
2081	1.215E+04	9.727E+06	6.536E+02	3.245E+03	4.863E+06	3.268E+02
2082	1.191E+04	9.534E+06	6.406E+02	3.180E+03	4.767E+06	3.203E+02
2083	1.167E+04	9.346E+06	6.279E+02	3.117E+03	4.673E+06	3.140E+02

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	*(m^3/year)*	*(av ft^3/min)*	*(Mg/year)*	*(m^3/year)*	*(av ft^3/min)*
2084	1.144E+04	9.160E+06	6.155E+02	3.056E+03	4.580E+06	3.077E+02
2085	1.121E+04	8.979E+06	6.033E+02	2.995E+03	4.490E+06	3.017E+02
2086	1.099E+04	8.801E+06	5.914E+02	2.936E+03	4.401E+06	2.957E+02
2087	1.077E+04	8.627E+06	5.796E+02	2.878E+03	4.314E+06	2.898E+02
2088	1.056E+04	8.456E+06	5.682E+02	2.821E+03	4.228E+06	2.841E+02
2089	1.035E+04	8.289E+06	5.569E+02	2.765E+03	4.144E+06	2.785E+02
2090	1.015E+04	8.125E+06	5.459E+02	2.710E+03	4.062E+06	2.729E+02
2091	9.945E+03	7.964E+06	5.351E+02	2.656E+03	3.982E+06	2.675E+02
2092	9.748E+03	7.806E+06	5.245E+02	2.604E+03	3.903E+06	2.622E+02
2093	9.555E+03	7.651E+06	5.141E+02	2.552E+03	3.826E+06	2.571E+02
2094	9.366E+03	7.500E+06	5.039E+02	2.502E+03	3.750E+06	2.520E+02
2095	9.181E+03	7.351E+06	4.939E+02	2.452E+03	3.676E+06	2.470E+02
2096	8.999E+03	7.206E+06	4.842E+02	2.404E+03	3.603E+06	2.421E+02
2097	8.821E+03	7.063E+06	4.746E+02	2.356E+03	3.532E+06	2.373E+02
2098	8.646E+03	6.923E+06	4.652E+02	2.309E+03	3.462E+06	2.326E+02
2099	8.475E+03	6.786E+06	4.560E+02	2.264E+03	3.393E+06	2.280E+02
2100	8.307E+03	6.652E+06	4.469E+02	2.219E+03	3.326E+06	2.235E+02
2101	8.143E+03	6.520E+06	4.381E+02	2.175E+03	3.260E+06	2.190E+02
2102	7.981E+03	6.391E+06	4.294E+02	2.132E+03	3.196E+06	2.147E+02
2103	7.823E+03	6.264E+06	4.209E+02	2.090E+03	3.132E+06	2.105E+02
2104	7.668E+03	6.140E+06	4.126E+02	2.048E+03	3.070E+06	2.063E+02
2105	7.516E+03	6.019E+06	4.044E+02	2.008E+03	3.009E+06	2.022E+02
2106	7.368E+03	5.900E+06	3.964E+02	1.968E+03	2.950E+06	1.982E+02
2107	7.222E+03	5.783E+06	3.885E+02	1.929E+03	2.891E+06	1.943E+02
2108	7.079E+03	5.668E+06	3.809E+02	1.891E+03	2.834E+06	1.904E+02
2109	6.939E+03	5.556E+06	3.733E+02	1.853E+03	2.778E+06	1.867E+02
2110	6.801E+03	5.446E+06	3.659E+02	1.817E+03	2.723E+06	1.830E+02
2111	6.667E+03	5.338E+06	3.587E+02	1.781E+03	2.669E+06	1.793E+02
2112	6.535E+03	5.233E+06	3.516E+02	1.745E+03	2.616E+06	1.758E+02
2113	6.405E+03	5.129E+06	3.446E+02	1.711E+03	2.564E+06	1.723E+02
2114	6.278E+03	5.027E+06	3.378E+02	1.677E+03	2.514E+06	1.689E+02
2115	6.154E+03	4.928E+06	3.311E+02	1.644E+03	2.464E+06	1.655E+02
2116	6.032E+03	4.830E+06	3.245E+02	1.611E+03	2.415E+06	1.623E+02
2117	5.913E+03	4.735E+06	3.181E+02	1.579E+03	2.367E+06	1.591E+02
2118	5.796E+03	4.641E+06	3.118E+02	1.548E+03	2.320E+06	1.559E+02
2119	5.681E+03	4.549E+06	3.056E+02	1.517E+03	2.274E+06	1.528E+02
2120	5.568E+03	4.459E+06	2.996E+02	1.487E+03	2.229E+06	1.498E+02
2121	5.458E+03	4.371E+06	2.937E+02	1.458E+03	2.185E+06	1.468E+02
2122	5.350E+03	4.284E+06	2.878E+02	1.429E+03	2.142E+06	1.439E+02
2123	5.244E+03	4.199E+06	2.821E+02	1.401E+03	2.100E+06	1.411E+02

APPENDIX B

2024 Waste Acceptance Summary

Milner Landfill
Rolling 12-Month Waste Acceptance Record

Month	Waste Acceptance Summation tons	Rolling 12-Month Total tons	PCS Waste Acceptance tons	PCS Rolling 12-Month Total tons	% of Total Waste Accepted %
January-22	2,738.27	51,801.81	0.00	693.42	1.34%
February-22	2,537.91	51,846.69	0.00	693.42	1.34%
March-22	3,033.54	51,397.86	0.00	693.42	1.35%
April-22	3,726.33	51,105.00	0.00	693.42	1.36%
May-22	5,293.37	52,399.75	0.00	669.99	1.28%
June-22	5,274.03	49,508.79	515.14	1,161.58	2.35%
July-22	6,239.25	50,836.24	1,556.23	2,717.81	5.35%
August-22	7,217.14	53,206.22	2,392.08	5,109.89	9.60%
September-22	6,690.81	54,053.93	1,952.29	7,062.18	13.07%
October-22	6,493.85	56,226.62	1,895.38	8,458.41	15.04%
November-22	3,852.18	56,475.19	463.38	8,774.50	15.54%
December-22	2,878.39	55,975.08	157.40	8,931.90	15.96%
January-23	3,125.33	56,362.14	240.02	9,171.92	16.27%
February-23	2,592.29	56,416.52	47.37	9,219.29	16.34%
March-23	3,287.37	56,670.35	1.91	9,221.20	16.27%
April-23	3,452.23	56,396.24	198.14	9,419.34	16.70%
May-23	5,698.17	56,801.05	140.63	9,559.97	16.83%
June-23	5,226.55	56,753.57	521.43	9,566.26	16.86%
July-23	6,689.17	57,203.49	2,761.49	10,771.52	18.83%
August-23	8,151.67	58,138.02	3,208.69	11,588.13	19.93%
September-23	8,250.15	59,697.36	4,006.74	13,642.58	22.85%
October-23	6,718.83	59,922.34	57.37	11,804.57	19.70%
November-23	3,587.04	59,657.19	30.02	11,371.21	19.06%
December-23	2,824.91	59,603.71	55.24	11,269.05	18.91%
January-24	2,881.67	59,360.05	0.00	11,029.03	18.58%
February-24	2,374.68	59,142.44	0.00	10,981.66	18.57%
March-24	2,493.56	58,348.63	0.00	10,979.75	18.82%
April-24	3,137.68	58,034.08	6.14	10,787.75	18.59%
May-24	5,341.57	57,677.48	0.00	10,647.12	18.46%
June-24	4,783.07	57,234.00	29.91	10,155.60	17.74%
July-24	5,153.69	55,698.52	352.87	7,746.98	13.91%
August-24	4,785.58	52,332.43	252.30	4,790.59	9.15%
September-24	5,885.95	49,968.23	754.16	1,538.01	3.08%
October-24	4,909.94	48,159.34	642.07	2,122.71	4.41%
November-24	5,540.02	50,112.32	2,983.13	5,075.82	10.13%
December-24	3,272.82	50,560.23	428.37	5,448.95	10.78%

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