



REGION 10

SEATTLE, WA 98101

Reply To: 20-C04

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Kevin Green
District Manager
Pierce County Recycling, Composting and Disposal DBA LRI
3 Waterway Square Place, Suite 110
The Woodlands, Texas 77380-3488

Re: INFORMATION REQUEST Regarding Pierce County Recycling, Composting and Disposal doing business as LRI, Graham, Washington

Dear Kevin Green:

The U.S. Environmental Protection Agency (EPA), Region 10 seeks information concerning the facility owned or operated by Pierce County Recycling, Composting and Disposal doing business as LRI ("LRI"), in Graham, Washington ("Facility"). The enclosed Information Request is issued to LRI pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414.

Under CAA Section 114, 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports and other information for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. LRI is required to provide information and documents in accordance with the enclosed Information Request within **15 days** of your receipt of the request. If you anticipate being unable to fully respond to this Information Request by the specified date, you may request an extension within **7 days** of receipt of this request. Include a justification for your extension request. If timely submitted, EPA will consider your request and may extend the deadline.

Submit your response to this Information Request or request for extension to:

Sara Conley
Conley.Sara@epa.gov
(206) 553-6914

Please ensure the enclosed Statement of Certification is signed by a duly-authorized officer or agent of LRI and returned with the response to this Information Request.

Failure to timely respond fully and truthfully to this Information Request may subject you to civil penalties pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

Your response to this Information Request may be used by EPA in administrative, civil or criminal proceedings.

Thank you for your cooperation. If you have any questions regarding this Information Request or wish to request an extension, please contact Sara Conley, at (206) 553-6914 or conley.sara@epa.gov. For legal matters or questions from legal counsel, please contact Brandon Cobb, in the Office of Regional Counsel, at (206) 553-6917 or cobb.brandon@epa.gov.

Sincerely,

**MORGAN
JENCIUS**

 Digitally signed by MORGAN
JENCIUS
Date: 2024.02.14 12:53:40 -08'00'

Morgan Jencius, Manager
Air and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosures

**ENCLOSURE 1
INFORMATION REQUEST**

Pierce County Recycling, Composting and Disposal DBA LRI

A. INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question in this Information Request. Mark each answer with the number of the question (and subpart, if applicable) to which it corresponds.
2. For each question, provide a copy of each document reviewed or referred to in the preparation of the response or that contains information responsive to the question.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, if you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. Provide the name, title, and business contact information for each person who prepared or was consulted in the preparation of your response. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained in this Information Request, or who may be able to provide additional responsive documents, provide the name, title, and business contact information for each such person and the additional information or documents that they may have.
6. If you believe a question is not applicable to the Facility, explain in detail the reason for that belief.
7. The information requested must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may assert a confidentiality claim covering part or all of the information submitted, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414 and 40 C.F.R. Part 2, by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA.

Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301 for additional rules governing certain information obtained under the CAA. Note that certain categories of information, including "emission data," are not entitled to confidential treatment. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. See also 41 Fed. Reg. 36902 (Sept. 1, 1976).

B. DEFINITIONS

All terms used in this Information Request have their ordinary meaning unless such terms are defined in this Information Request; the CAA, 42 U.S.C. 7401, *et seq.*; or 40 C.F.R. Parts 60, 62, and 63. For purposes of this Information Request:

1. The terms “Pierce County Recycling, Composting and Disposal DBA LRI” and “LRI” mean Pierce County Recycling, Composting and Disposal DBA LRI and its subsidiaries, officers, directors, managers, partners, employees, contractors, trustees, successors, assigns, and agents, as applicable.
2. “Document” and “documentation” include writings, records, communications, or information of any kind, formal or informal, whether handwritten, typed, or otherwise recorded in or on any format or media. If in computer format or memory, each such document shall be provided in a form useable and readable by EPA, with all necessary documentation and support. Include all attachments to or enclosures with any responsive document.
3. The terms “site” and “facility” refer to LRI landfill, located at 30919 Meridian Avenue East, Graham, WA 98338.
4. The term “increased meter reading” means a single or series of meter reading(s) above 200 ppm of methane.
5. The terms “Unmanned aerial system” and “(UAS),” commonly known as a drone, refer to an aircraft without any human pilot, crew or passengers on board. In this context, UAS refers to a device used for the detection of landfill gas emissions per EPA-approved OTM-51 (available at <https://www.epa.gov/system/files/documents/2022-12/OTM%2051-%20UAS%20Application%20of%20Method%2021%20for%20Surface%20Emission%20Monitoring%20of%20Landfills.pdf>).
6. The term “GPS location” refers to the coordinates of a location in the form of a latitude and longitude.
7. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.
8. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a question or questions.

C. **INFORMATION REQUEST**

Pierce County Recycling, Composting and Disposal DBA LRI (“LRI”) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Please provide all documents related to surface emission monitoring conducted at the Facility using a UAS during calendar years 2023 and 2024. This includes, but is not limited to, the following:
 - a. List all dates of UAS surface emissions monitoring at the Facility since January 1, 2023 (“monitoring event”).
 - b. Describe the UAS methane detection payload detector type used at the Facility.
 - c. For each monitoring event, provide calibration records for the UAS methane detector and for the detector used for manual inspection.
 - d. Provide the GPS location of all increased meter readings observed or recorded by the UAS data acquisition system.
 - e. Provide the concentrations in ppm of the ground-based verification readings of all increased meter readings and the date the verification reading was made.
 - f. For all re-monitoring: provide the date, GPS location, reference gas well and location description, initial reading in ppm and re-monitored concentration in ppm.
 - g. Provide all photos, including georeferenced pictures from the UAS gimbaled camera, of features that indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover and cover penetrations.
 - h. For each UAS monitoring event, provide a map or maps of the following:
 - i. Initial UAS inspection monitoring route.
 - ii. Locations of penetration exceedances.
 - iii. Locations of exceedances and areas of concern.
 - iv. Measurements made at each penetration including an indication of whether the penetration reading was above 499 ppm or at or below 499 ppm.
 - v. The UAS path.
 - vi. Locations of each re-monitoring event showing the location of any exceedances and where the monitoring was conducted.
2. Provide the Q3 2023 SEM report.
3. Provide all documentation of monthly cover integrity observations from April 2023 to present.
4. Provide all well monitoring data from April 1, 2022 through February 1, 2024 in a excel or csv file.

**ENCLOSURE 2
STATEMENT OF CERTIFICATION**

Pierce County Recycling, Composting and Disposal DBA LRI

**INFORMATION REQUEST
STATEMENT OF CERTIFICATION**

I certify that the enclosed responses to EPA's Information Request issued to Pierce County Recycling, Composting and Disposal DBA LRI are true, accurate, and complete. I certify that the portions of these responses that I did not personally prepare were prepared by persons acting on behalf of Pierce County Recycling, Composting and Disposal DBA LRI under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

Signature

Printed Name

Title

Date