



REGION 2

NEW YORK, N.Y. 10007

Via Electronic Mail – JJaen@ecwaste.com

Mr. Jaime J. Jáen
Vice President
EC Waste (El Coqui Landfill Company, LLC)
P.O. Box 918 Punta Santiago
Humacao, PR 00741-0918

Re: Information Request, Reference Number: CAA-02-2025-1405

Dear Mr. Jáen:

The Clean Air Act, 42 U.S.C. §§ 7401 *et seq.* (“CAA” or the “Act”), at Section 114, 42 U.S.C. § 7414, authorizes the U.S. Environmental Protection Agency (“EPA”) to require submittal of information to, among other things, assess compliance with the Act and regulations promulgated pursuant to the Act. This Information Request requires EC Waste (El Coqui Landfill Company, LLC) (“ECL”) to submit information related to compliance with applicable CAA requirements at El Coqui Landfill located in Humacao, Puerto Rico.

On May 1, 2024, EPA conducted a CAA compliance inspection at El Coqui Landfill (the “Inspection”). During the Inspection, ECL was informed about EPA’s intention to request further information and documentation to complete the necessary post-inspection process.

Pursuant to Section 114 of the Act, this Information Request requires ECL to submit all the information described in Enclosure 1. Failure to submit the requested information is a violation of Section 114 of the Act, and may result in an order to comply, an order for administrative penalties, or a civil action for penalties and an injunction requiring compliance pursuant to EPA’s enforcement authority provided in Section 113(a) of the Act. See Enclosure 2. In accordance with Section 113(c)(2)(A) of the Act, any person who knowingly makes any false statement, representation, or certification, or who omits material information from or knowingly alters, conceals, or fails to file a response to this Information Request, may be subject to a criminal action.

You may choose to assert a business confidentiality claim covering part or all the information submitted. You may not, however, withhold any information on that basis. For EPA to consider a claim of business confidentiality for one or more of the documents submitted by you, a cover sheet, stamped or typed legend, or other suitable form of notice must be placed on or enclosed with the document, with language such as “trade secret,” “proprietary,” or “company confidential.” Allegedly confidential

portions of otherwise non-confidential documents should be clearly identified. To facilitate identification and handling by EPA, please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope and all materials that you assert are entitled to confidential treatment are in a separate envelope. Note that “emission data,” as defined in 40 C.F.R. § 2.301(a)(2), cannot be claimed as confidential under Section 114(c) of the Act. See 42 U.S.C. § 7414(c). If no confidentiality claim accompanies the information received by EPA, the information submitted as part of your response may be made available to the public without further notice to you. EPA will disclose information covered by a confidentiality claim only to the extent allowed by, and in accordance with, the procedures set forth in EPA’s public information regulations at 40 C.F.R. §§ 2.201, *et seq.* (See 41 Fed. Reg. 36902 (Sept. 1, 1976)), and with applicable case law.

In order to comply fully with this Information Request, your response must include a completed Certification of Response (*see Attachment to Enclosure 1*), notarized by a notary public, and signed by you or another authorized officer of your company. Your responses to the questions in Enclosure 1, including all supporting documents and the Certification of Response, must be scanned, and submitted by email to Mr. Robert Buettner of the EPA, in accordance with the schedule set forth in Enclosure 1, at her email address below:

Mr. Robert Buettner, Chief
Enforcement and Compliance Assurance Division (ECAD)
Air Compliance Branch
U.S. Environmental Protection Agency, Region 2
Buettner.Robert@epa.gov

with copies sent to:

Joseph Cardile
Cardile.Joseph@epa.gov

and

Gloria Diaz-Galarza
Diaz-Galarza.Gloria@epa.gov

The requested information shall be submitted to EPA within the timelines indicated for the specific requests in Part III of Enclosure 1. You may request an extension of any timeline to respond by email to Mr. Buettner at his email address above. Please include the reason(s) for the delay in responding and a

proposed response date. In order to allow sufficient time for review, any such request for an extension of time must be made at least ten (10) calendar days prior to the date on which the requested information is due to EPA. An extension of time will be effective only if granted by EPA in writing.

Please include the above-cited Reference No. CAA-02-2025-1405 in any and all of your response(s) to this Information Request. Further, if within one year of the date of this Information Request, you obtain information different from, or in addition to, the information provided, or if there is any change affecting the information submitted, you must notify EPA and submit the relevant information no later than twenty (20) calendar days after such information becomes available.

You may address any questions concerning this matter to Mr. Joseph Cardile in the EPA Region 2 ECAD Air Compliance Branch at Cardile.Joseph@epa.gov, or by phone at 212-637-4054 or to Suzette Meléndez-Colón, Assistant Regional Counsel, at Melendez-Colon.Suzette@epa.gov or by phone 787-977-5822. We appreciate and look forward to your prompt response.

Sincerely,

**KATHLEEN
ANDERSON** Digitally signed by
KATHLEEN ANDERSON
Date: 2025.01.07
16:07:11 -05'00'

Kathleen Anderson, Director

Enforcement and Compliance Assurance Division

Enclosures

cc: Mr. César Rodríguez, Puerto Rico Department of Natural and Environmental Resources (DNER), Acting Air Quality Area (AQA) Manager CesarRodriguez@drna.pr.gov

DNER AQA, air@drna.pr.gov

REPORTING REQUIREMENT PURSUANT TO SECTION 114 OF THE CLEAN AIR ACT

The U.S. Environmental Protection Agency (“EPA”) requires the submittal of information regarding operations and compliance of EC Waste (El Coqui Landfill Company, LLC) (“ECL”) at its facility Landfill located PR-923, Km. 2.5, Buena Vista Ward, Humacao, Puerto Rico.

Part I: Instructions

1. Provide all responsive documents in Portable Document Format (“PDF”) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel format, and not in image format. If Excel formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel.
3. Submit large electronic files via **GoAnywhere Services**, a file transfer tool used by EPA. A link to **GoAnywhere Services** will be provided upon request.
4. Provide a table of contents for your submission so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number and facility name.
5. Emission data obtained through Section 114 of the CAA is **not** considered confidential business information (“CBI”), pursuant to 42 U.S.C. § 7414(c) and 40 C.F.R. § 2.301(a)(2)(i). Any information claimed as CBI must be submitted on separate drives or folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.
7. If you have no information or documents responsive to a request, please so state in your response.

8. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information are not available or in your possession and identify any source that either possesses or is likely to possess such information.
9. To the extent that a document is responsive to more than one request, please so state and provide only one copy of the document.
10. All terms used in this information request have their ordinary meaning, unless such terms are defined in the CAA, 42 U.S.C. §§ 7401, *et seq.*

Part II: Definitions

All terms used in this Information Request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401, *et seq.*, or are defined in the applicable regulations implementing the Act, including any state regulations that are federally enforceable under the Act, in which case the statutory or regulatory definitions shall apply. Specific terms are defined as follows:

1. *Abandoned* means, when used in reference to a component of the gas collection system, a component that has been cut off below the surface, capped, and backfilled.
2. *Document* and the plural form thereof means all written, recorded, or graphic matters, however produced or reproduced, of every kind and description, pertaining in any way to the subject matter of this action. The term "Document" shall include, but are not limited to: any receipts; invoices; shipping records; purchase orders; purchase records; books; pamphlets; periodicals; memoranda (including those of telephone or oral conversations); contracts; correspondence; agreements; applications; financial records; security instruments; disbursements; checks; bank statements; time records; accounting or financial records; notes; diaries; logs; facsimiles (faxes); telegrams or cables prepared, drafted, received or sent; electronic mail (emails), whether drafted, received, or sent; tapes; transcripts; recordings; minutes and notes of meetings; directives; work papers; charts; drawings; prints; flow sheets; photographs; infrared camera recordings; film; computer printouts; x-ray photographs; advertisements; catalogs; data; sampling reports, plans, protocols, reports, analyses; or any handwritten, recorded, transcribed punched, taped, filmed, or graphic matter, however produced or reproduced, in Your possession, custody, or control or to which You have or have had access.
3. *Facility or Facilities* means all operations located at PR-923, Km. 2.5, Buena Vista Ward, Humacao, PR, respectively, and associated adjacent or nearby operations owned or operated by EC Waste (El Coqui Landfill Company, LLC) ("ECL").

4. *Gas Collectors* means vertical wells, horizontal collectors, or other collection devices capable of collecting and extracting gas at the landfill and meets the requirements of 40 C.F.R. § 63.1962 and parallel provisions under the other EPA Landfill Air Regulations.
5. *Gas collection system* means an active or passive system of wells or similar collection components used to collect and move gas at the landfill.
6. *Gas Collection and Control System or GCCS* means an active or passive system of wells or similar collection components to move gas at the landfills to associated control devices per the requirements at 40 C.F.R. § 63.1959(b)(ii) and parallel provisions under the other EPA Landfill Air Regulations.
7. *Gas Collection and Control System Design Plan, or Design Plan*, means a plan that is developed by the landfill and meets the requirements of 40 C.F.R. § 63.1981(d) and parallel provisions under the other EPA Landfill Air Regulations.
8. *Gas Control System* means the systems that treat and/or destroy landfill gases collected by the gas collection system, including but not limited to flares, gas to energy projects, and renewable natural gas plants, as well as any other control devices and treatment systems used to fulfill the control requirements of 40 C.F.R. § 63.1959(b)(2)(iii) and parallel provisions under the other EPA Landfill Air Regulations.
9. *Gas mover equipment* means the equipment (*i.e.*, fan, blower, compressor) used to transport landfill gas through the header system.
10. *Inactive collector* means a gas collection device that is no longer collecting gas, whether temporarily or permanently.
11. *Landfill* means the municipal solid waste (MSW) landfill operated by ECL.
12. *Landfill Air Regulations* refers to 40 C.F.R. Part 60, Subpart WWW; 40 C.F.R. Part 60, Subpart XXX; 40 C.F.R. Part 62, Subpart OOO; 40 C.F.R. Part 62, Subpart GGG; 40 C.F.R. Part 63, Subpart AAAA; and State Plan for the Control of Emissions from Existing Municipal Solid Waste Landfills incorporated under PR Regulation No. 6303, dated March 21, 2001.
13. *LandGEM* means EPA's Landfill Gas Emissions Model, which is an automated estimation tool with a Microsoft Excel interface that can be used to estimate emissions for total landfill gas, methane, carbon dioxide, nonmethane organic compounds, and individual air pollutants from municipal solid waste landfills.
14. *Leachate* means liquids, including landfill gas condensate inside the landfill.

15. *Owner or Operator* means any Person who owns, leases, operates, controls, or supervises the Facility.
16. *Person* or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country), or any other entity, and includes ECL.
17. *Radius of influence* means the distance from the well center to a point in the landfill where the pressure gradient applied by the blower or compressor approaches zero.
18. *State* means a State, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, and American Samoa and includes the Commonwealth of the Northern Mariana Islands. 42 U.S.C. § 7602(d).
19. *Surface Emission Monitoring* or *SEM* means monitoring surface concentrations of methane at collection areas of a landfill, as required by 40 C.F.R. §§ 63.1960(c) and (d) and parallel provisions under the other EPA Landfill Air Regulations.
20. *You* and/or *Your* means ECL and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive) of relevant information that is otherwise available to You or may have obtained information for or on Your behalf.

Part III: Specific Information Requested

EC Waste (El Coqui Landfill Company, LLC) ("ECL") must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). For each numbered request, please indicate the individual(s) who were responsible for answering and provide their title and email address. Except as specifically provided in Part III of Enclosure 1 of this Information Request, provide the following information regarding the Facility within thirty **(30) days** from the receipt of this Information Request. Unless otherwise stated, this information shall be submitted in Microsoft Excel, Microsoft Word, or optical character recognition Adobe Acrobat PDF format, depending on the information requested.

General Applicability:

1. Identify on what dates, since [YEAR of START DATE] the Landfill believes it became subject to, opted-in to, or was no longer subject to, in part or in whole, the Federal programs listed below. Explain your reasoning.

- a. 40 C.F.R. Part 60, Subpart WWW;
 - b. 40 C.F.R. Part 60, Subpart XXX;
 - c. 40 C.F.R. Part 62, Subpart OOO;
 - d. A State Plan implementing 40 C.F.R. Part 60 Subpart Cf; and/or
 - e. 40 C.F.R. Part 63, Subpart AAAA.
2. Following your response to Request #1, provide copies of the relevant initial design capacity reports.

(As referenced in 40 C.F.R. §§ 63.1981, 63.1983(a) and parallel provisions under EPA's Landfill Air Regulations).

Corporate Structure and Agreements:

3. Provide agreements between ECL (or other previous operators of the Landfill) pertaining to the following shared or separate responsibilities going back to CY 2019:
 - a. Operation of the gas collection system on the Landfill;
 - b. Gas routing and operation of controls for gas collected from the Landfill;
 - c. CAA reporting, monitoring, or compliance requirements at the Landfill, including for treatment systems, pursuant to 40 C.F.R. § 63.1959(c) and (d) and parallel provisions under EPA's Landfill Air Regulations; and
 - d. Waste and operations at the Landfill.
4. Describe the current business structure of ECL and its affiliated organization's entities under common ownership, and relative ownership interests in each entity. If available, provide an organizational chart depicting the parent and subsidiary companies affiliated with ECL.
5. Identify the manager and any members, as those terms are defined in the applicable state limited liability company statute, of any parent companies.
6. Identify the directors and officers, as those terms are defined or used in the applicable state corporation act, of any parent companies.
7. Identify, by name, employer, and job title, all individuals from 2019 to present who make high-level operational decisions for the Facility and day-to-day management decisions for the Facility. To the extent individuals involved had more than one title or employer, provide each title and employer.
8. For each Permit and Design Plan, describe the approval process within the Facility. If approval for obtaining such Permits or Design Plans is also required from the Facility's parent company or companies, describe the approval process within the parent company's corporate structure, including the chain of the requisite approvals for this decision-making process, the individuals who

were involved in the decision-making process, the employer and title of each individual involved, and the ultimate decision maker and/or entity within the corporate structure that provided final approval. To the extent individuals involved had more than one title or employer, provide each title and employer.

Permits and Applications/Alternatives/Variations/Previous Enforcement:

9. Provide copies of the following documents for the Facility:
 - a. All permit(s) in effect as of the date of this Request and the permit application(s) you submitted to obtain each such permit;
 - b. Permit application(s) pending as of the date you received this Request;
 - c. The original construction permit(s) and permit application(s). If an original construction permit has been modified, provide the current version of the construction permit; and
 - d. Title V permit compliance certifications and deviation reports between year 2019 and the date of this request.

10. Provide a copy of the following:
 - a. All applicability determination or regulatory interpretation requests to and responses from the Puerto Rico Department of Natural and Environmental Resources (“DNER”) or EPA;
 - b. All approvals of alternatives to Landfill Air Regulation requirements issued by DNER or EPA; and
 - c. Alternative compliance timeline requests to and responses from the DNER or EPA.

11. Provide copies of CAA regulatory enforcement documents issued by EPA or DNER, including but not limited to citations, notices of violation, administrative orders (unilateral or on consent), consent decrees, and decrees or orders terminating any of the foregoing documents issued to ECL regarding CAA compliance at the Facility, dated between year 2019 to the date of this request.

12. Provide copies of any citizen suit complaints filed with a judicial court and resulting agreements related to CAA compliance at the Facility.

13. In an unlocked, Excel-compatible spreadsheet provide information regarding citizen complaints that the Landfill has knowledge of between year 2019, and the date of this Request. The information should include:
 - a. Date and time;
 - b. Location at or near the Landfill which is the subject of the complaint;
 - c. Description of complaint;
 - d. Corrective action or monitoring done as a result of the complaint; and
 - e. Name and contact information of the person who submitted the complaint.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

Semi-annual/Annual Reports:

14. Provide the semi-annual and annual reports between year 2019 and the date of this Request.

(As referenced in 40 C.F.R. §§ 63.1959(a)-(b), 63.1981(h) and parallel provisions under EPA’s Landfill Air Regulations).

Waste Type and Quantity Data:

15. In an unlocked, Excel-compatible electronic spreadsheet format, provide the monthly quantity (short tons or megagrams, labeled) of waste accepted at the Landfill between year 2019 and the date of this request, including:

- a. A breakdown by type of waste (e.g., municipal solid waste, construction and demolition, asbestos, sludge, etc.);
- b. Specify segregated Landfill location(s) or cell(s) in which each type of waste was placed;
- c. List the types and quantities of waste that are excluded from the maximum expected gas generation calculation and the rationale for excluding those types of waste; and
- d. List the types and quantities of waste that are classified as “inert” in facility reports for Greenhouse Gas Reporting Program pursuant to 40 C.F.R. § 98.346(c).

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. §§ 63.1983(a), (d) and parallel provisions under EPA’s Landfill Air Regulations).

16. Provide the current topographic site map(s) displaying the following information:

- a. Cell and phase identifiers, including but not limited to the dates that each cell and phase started and stopped accepting waste;
- b. Areas under daily cover, areas under intermediate cover, areas at final grade not under final cover, and areas at final grade under final cover;
- c. Segregated areas for special types of waste and nondegradable waste; and
- d. Leachate collector locations and identifiers, including leachate and leachate header lines.

(As referenced in 40 C.F.R. §§ 63.1981(a)(1), 63.1983(d) and parallel provisions under EPA’s Landfill Air Regulations).

Gas Collection and Control System (GCCS) Design:

17. Provide a copy of the following documents related to the Design Plan as required under 40 C.F.R. § 63.1981 and parallel provisions under EPA Landfill Air Regulations:
- a. Design Plans for the GCCS operated at the Landfill since year 2019.
 - b. Copies of DNER approval, disapproval, or other response to the two most recent Design Plans. If DNER did not provide an approval, disapproval, or other response, provide a statement that DNER did not approve, disapprove, or otherwise respond to ECL submission of the Design Plan(s).
 - c. An explanation for areas excluded from gas collection;
 - d. A description of the design of the main gas header, including:
 - i. Diameter size;
 - ii. Maximum rated flow rate capacity;
 - iii. Maximum operating flow rate; and
 - iv. Maximum allowable pressure drops.
 - e. As-built, final design documents for each flare/blower system. The design documents shall include but not be limited to the following (for each piece of equipment):
 - i. The manufacturers' expected/design life (years);
 - ii. Minimum and maximum design flare temperatures (°F);
 - iii. Maximum exit velocity allowed by a CAA permit;
 - iv. The rated maximum flow rate capacity of the flare (standard cubic feet per minute, scfm); and
 - v. The blower(s) and backup blower(s) rated maximum flow rate at inlet vacuum and discharge pressure.
 - f. Most recent maximum expected gas flow rate calculations, if not from the Design Plan.
 - i. Include the annual or monthly waste breakdown for every year used in the maximum expected gas flow rate calculations.
 - ii. If LandGEM is used, provide the unlocked, Excel-compatible electronic spreadsheet containing the most recent LandGEM calculation.
 - iii. If LandGEM is not used, provide the most recent maximum expected gas flow rate calculations.
 - iv. Include scale house data of waste excluded from LandGEM calculations.

(As referenced in 40 C.F.R. § 63.1981 and parallel provisions under EPA's Landfill Air Regulations).

18. Provide the initial and subsequent performance test report(s) for the GCCS (e.g., enclosed combustors, candlestick flares, engines), including but not limited to those performed to demonstrate compliance with 40 C.F.R. §§ 63.1959(b)(2)(iii) and 63.1981(i) and parallel provisions under EPA Landfill Air Regulations, and reports for additional performance or stack tests conducted

for any purpose (including compliance testing, engineering testing, and testing for general information) between year 2014 and the date of this Request.

(As referenced in 40 C.F.R. § 63.1983(b) and parallel provisions under EPA's Landfill Air Regulations).

Gas Collection System:

19. Provide the following information for the gas collection system:

- a. List of existing and historical gas collectors and leachate collectors, which are or were connected to the GCCS;
- b. Date of installation of each existing and historical gas well or leachate collector. For each redrilled well, explain why the well was redrilled;
- c. For each existing or historical well or leachate collector that is not in active service collecting landfill gas as of the date of this Request, provide the date on which the well or collector was taken out of active service and describe the status of the well/collector, including whether the valve is open or closed, whether the well/collector is connected to the GCCS, whether the header lateral has been capped, and whether the well has been abandoned as defined in Appendix A of this Request. Provide justification for deactivation of the well and approvals as applicable;
- d. Indicate whether a gas well is a vertical or horizontal well;
- e. Indicate the location of each well, both by cell and phase identifier and by GPS coordinates;
- f. Indicate whether each existing gas well has a pump for leachate/water removal;
- g. Indicate higher operating value or alternative operating procedure for gas wells;
- h. Installation dates for collectors installed between year 2014 and the date of this Request; and
- i. From year 2014 to the date of this Request, evaluations, or analyses, conducted either by you or an external consultant/company, of the gas collection network, including any evaluation or analysis related to:
 - i. Well placement;
 - ii. Well depth;
 - iii. Well density;
 - iv. Amount of vacuum applied; and
 - v. Estimated radius of influence.

(As referenced in 40 C.F.R. §§ 63.1957-62, 63.1981(d)-(e) and parallel provisions under EPA's Landfill Air Regulations).

20. Provide the current topographic site map(s) displaying the following information:

- a. Gas well locations and identifiers, including gas laterals and gas headers;

- b. A schematic depicting each landfill gas collection well and its current, estimated radius of influence;
- c. Areas in which waste has been in place for 5 years or more if active (or 2 years or more if closed or at final grade); and
- d. Areas in which gas collection is not occurring.

(As referenced in 40 C.F.R. § 63.1958(d) and parallel provisions under EPA’s Landfill Air Regulations)

Wellhead Monitoring Data:

21. In an unlocked, Excel-compatible electronic spreadsheet format, provide GCCS monitoring records, including dates, times, and descriptions of all monitoring activity, as well as corrective actions taken as a result of monitoring at the Facility, between year 2019 and the date of this request, including the following:
- a. Monthly GCCS wellhead measurements, including:
 - i. Methane;
 - ii. Hydrogen;
 - iii. Carbon dioxide (CO₂)
 - iv. Carbon monoxide (CO);
 - v. Flow rate;
 - vi. Oxygen;
 - vii. Nitrogen;
 - viii. Pressure;
 - ix. Temperature; and
 - x. Notes taken by the technician during monitoring, corrective actions, and re-monitoring measurements.
 - b. Monitoring data for each blower, including vacuum;
 - c. Available vacuum and oxygen measurements collected at the lateral headers, landfill gas transmission piping, and isolated segments of the GCCS;
 - d. Gas well parameter exceedances and corrective actions, including enhanced monitoring due to elevated temperatures, and corrective actions;
 - e. Wellhead higher operating values approvals relevant from year 2014 and the date of this request, along with approvals of alternative timelines or corrections in that time; and
 - f. A list of gas wells not monitored during monthly monitoring and the explanation for exclusion.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. §§§§§ 63.1958(b)-(c), 63.1961, 63.1962, 63.1981, 63.1983, and parallel provisions under EPA’s Landfill Air Regulations.

Depth-to-Water and Depth of Perforation Data:

22. In an unlocked, Excel-compatible spreadsheet(s), provide the following information related to each vertical gas well available between year 2019 and the date of this request:
- a. Records of measurements of depth to water and/or height of water taken between year 2019 and the date of this Request;
 - b. Documentation of pinches and other obstructions;
 - c. Depth to bottom of the well;
 - d. Length of perforated pipe;
 - e. Percentage of perforation; and
 - f. A description of corrective actions taken by the facility as a result of the water level measurements or observation of obstructions, as applicable.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1962(b)(2), and parallel provisions under EPA’s Landfill Air Regulations)

23. Provide a description of standard operating procedures or internal guidelines relating to well obstruction and/or dewatering at the Facility.

GCCS Main Header Data:

24. In an unlocked, Excel-compatible spreadsheet, provide the following landfill gas collection system main header data on an hourly basis from 2019 and the date of this request:
- a. Date and hour;
 - b. Average system pressure (inches of water column, in. w.c.);
 - c. Average gas flow rate collected (standard cubic feet per minute, scfm);
 - d. Average landfill gas temperature (degree Fahrenheit, °F); and
 - e. Average methane concentration.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1961(a), and parallel provisions under EPA’s Landfill Air Regulations)

25. Provide gas sampling reports between year 2019 and the date of this Request. Your response should include, but not be limited to:
- a. Sampling done for methane concentration;
 - b. Sulfur compounds; and

- c. Hazardous air pollutant (HAP) content.

Gas Control System:

General

26. Provide a description of the as-built gas control system, including each piece of equipment that is part of the system, such as flares, associated blowers, and back-up controls. Where applicable, your description must reference previously submitted reports to the Agency. Include the following information in your description:
- a. The make and model of each piece of equipment that is part of the gas control system;
 - b. The date of manufacture and installation;
 - c. Design specifications including, but not be limited to the following:
 - i. The manufacturers' expected/design life (years);
 - ii. The minimum and maximum, if applicable, design temperatures (degree Fahrenheit, °F);
 - iii. The maximum rated operating capacity (e.g., British thermal units, per hour, Btu/hr.);
 - iv. The minimum and maximum, if applicable, rated gas flow rate to the device (standard cubic feet per minute, scfm);
 - v. The maximum exit velocity permitted or recommended by the manufacturer;
 - vi. The maximum blower inlet vacuum and discharge pressure (standard cubic feet per minute, scfm, and inches of water column, in. w.c., or equivalents);
 - vii. The system shutdown set points for velocity and temperature during normal and emergency operations; and
 - viii. The equipment operating parameters and limits;
 - d. A description of each emergency shut down procedures after detection of a malfunction; and
 - e. The user manual and manufacturer's recommendations for each system.

(As referenced in 40 C.F.R. § 63.1981, and parallel provisions under EPA's Landfill Air Regulations)

27. Provide monthly inspection, maintenance, and repair logs and records for each piece of control equipment (e.g., blower/flare system) between year 2019 and the date of this request.

(As referenced in 40 C.F.R. § 63.1983(c)(7), and parallel provisions under EPA's Landfill Air Regulations)

28. In an unlocked, Excel-compatible spreadsheet, provide monitoring data described below for each control device, excluding flares. Provided data collected between year 2019 and the date of this Request. The requested monitoring data should include gas filtration and treatment:
- a. Temperature or heat sensing data;

- b. Gas flow rate. The flow rate should be represented as total gas flow rate. Where a gas plant has more than one control device or bypass, provide individual flow rates and the gas flow to each pilot flame;
- c. Continuous sulfur monitoring data, if available;
- d. Operating hours on a monthly basis for each control device;
- e. Records of bypass incidents at each control device; and
- f. Monthly emissions (tons/month) with supporting calculations, for:
 - i. Volatile organic compounds;
 - ii. Nitrogen oxides;
 - iii. CO; and
 - iv. Sulfur dioxide (SO₂).

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1961, and parallel provisions under EPA's Landfill Air Regulations)

29. In an unlocked, Excel-compatible spreadsheet, provide the following monitoring data for each flare between year 2019 and the date of this request:
- a. Temperature readings;
 - b. Gas flow readings;
 - c. Methane percentages at each flare;
 - d. Operating hours on a monthly basis for each flare;
 - e. Records of bypass incidents at each flare; and
 - f. Monthly SO₂ emissions calculations (tons/month, tons/year) for each flare system with supporting calculations.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1961(b)-(c), and parallel provisions under EPA's Landfill Air Regulations)

Surface Emissions Monitoring (SEM)

30. In an unlocked, Excel-compatible spreadsheet, where applicable, provide SEM records since year 2019. Please make sure units of measurement are clearly indicated. For each monitoring event, include:
- a. Date(s) and description(s) of the monitoring activity, including identification of the device used;

- b. SEM data, including but not limited to instrument calibration data, methane concentration at the location of each monitored exceedance marked according to 40 C.F.R. § 63.1960(c)(4)(i), any other recorded methane concentrations, raw instrument data outputs, methane concentration upon re-monitoring at the location of each monitored exceedance; and
 - c. Records or descriptions (if the facility does not maintain records) of corrective actions performed in response to each monitored exceedance;
31. GPS coordinates, notes, drawings, maps, or other records of the actual path traversed by the SEM technician for each quarterly SEM event since year 2019, depicting:
- a. The monitoring route traveled and any deviations from the thirty (30)-meter intervals; and
 - b. areas excluded from surface emission monitoring (SEM) or exempt from quarterly SEM, including explanation(s) for each area excluded or exempted.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)

32. Records or reports of additional emissions monitoring activities conducted at the direction of the Facility, including but not limited to drone, satellite, and tower-based monitoring, between year 2019 and the date of this Request.
33. All training, instructional, or procedural materials provided to the SEM technicians, including contractors.

Inspection follow-up

34. Provide post- May 1, 2024's Inspection SEM follow-up information, including the following:
- a. For each of the monitored exceedance locations identified by EPA during the Inspection, provide the SEM concentrations recorded during each re-monitoring event and the corrective action(s) completed or planned at each location;
 - b. A GCCS map generated prior to EPA's SEM inspection, depicting the location of subsequent SEM corrective actions;
 - c. A GCCS map generated after EPA's SEM inspection, depicting new or replacement piping and/or wells installed as SEM corrective actions;
 - d. Provide photos/videos taken by your employees or contractors during the Inspection; and
 - e. Approvals of alternatives to expansion of the GCCS or alternative compliance timelines.

Cover Integrity

- 35. Describe the cover integrity program you used to comply with 40 C.F.R. §§ 60.755(c)(5), 62.16720(c)(5), and 63.1960(c)(5), between year 2019 and the date of this Request and provide procedures, maps, or other documents you use to implement the cover integrity program.
- 36. For the period of year 2019 through the date of this Request, provide monthly cover integrity reports, including descriptions of corrective actions and corrective action start and completion dates.

(As referenced in 40 C.F.R. § 63.1960(c)(5), and parallel provisions under EPA’s Landfill Air Regulations)

- 37. Provide a list of alternative covers approved for use at Landfill and indicate time periods in which each alternative cover has been used at Landfill since year 2019.

(As referenced in 40 C.F.R. § 63.1960(c)(4)(5), and parallel provisions under EPA’s Landfill Air Regulations)

Gas Migration

- 38. In an unlocked, Excel-compatible spreadsheet, provide gas measurements at the gas probes located at the boundary of the Landfill between year 2019 and the date of this request. Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1960(c), and parallel provisions under EPA’s Landfill Air Regulations)

- 39. Provide records of corrective actions taken and remediation plans made in response to methane readings in measurements taken at the probes.
- 40. Provide a map of the probe locations.

(As referenced in 40 C.F.R. §§ 63.1960(c), 63.1961(f), and parallel provisions under EPA’s Landfill Air Regulations)

Miscellaneous:

Leachate System

41. Provide the following information regarding leachate and condensate management at Landfill:
- a. The location(s), including latitude and longitude, of the leachate sump(s);
 - b. The on-site storage capacity (gallons) of leachate and condensate;
 - c. Air pollution or odor controls on the storage vessels; and
 - d. Moisture by weight calculations in cells and phases where liquids other than leachate and condensate are added, including where they do not follow bioreactor requirements.

(As referenced in 40 C.F.R. § 63.1962(a), and parallel provisions under EPA’s Landfill Air Regulations)

42. In an unlocked, Excel-compatible spreadsheet, provide the following data about the leachate system between year 2019 and the date of this request:
- a. Monthly quantity (gallons) of leachate and other liquids added (other than leachate and condensate);
 - b. Quantity (gallons) of leachate and condensate transported, collected, and recirculated, as applicable. Please indicate an interval of time (*e.g.*, days, weeks, or months); and
 - c. Include when each cell and phase started recirculation or liquid addition.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. §§ 63.1962(a), 63.1982(c), and parallel provisions under EPA’s Landfill Air Regulations)

White Goods Management

43. Provide an estimate of the number of small appliances, motor vehicle air conditioners (“MVAC”), and MVAC-like appliances, as defined at 40 C.F.R. § 82.152, received per month at the Landfill over the past three years.
44. Provide a summary of the Landfill’s process for receiving and disposing of small appliances, MVACs, and/or MVAC-like appliances. Include:
- a. Any restrictions on appliances accepted, and
 - b. Whether the facility recovers refrigerant on site or, if it requires any documentation from its customers delivering small appliances, MVACs, and/or MVAC-like appliances to verify recovery of the refrigerant prior to delivery.

45. If the Facility recovers refrigerant on site, provide:

- a. Equipment certification information per 40 C.F.R. § 82.158(e)-(g), including picture(s) of the label(s) with certification information, manufacture date, and serial number per 40 C.F.R. § 82.158(h), and
- b. Records for shipments of recovered refrigerant from 2022 to present, or otherwise a description/record of the fate of recovered refrigerants.

46. If the Facility verifies refrigerant recovery using signed statement or contract, provide:

- a. All contracts with suppliers of appliances received from 2022 to present;
- b. Copies of signed statements from all disposed-of appliances from:
 - i. The previous thirty (30) days,
 - ii. The month of August 2023,
 - iii. The month of November 2022;
- c. A picture of the signage or copy/description of the notification provided for the requirement of proper refrigerant disposal to suppliers of appliances per 40 C.F.R. § 82.155(b)(2)(ii).

ATTACHMENT 1 TO ENCLOSURE 1

CERTIFICATION OF RESPONSE

State/Territory of _____:

Municipality of _____:

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to the Information Request and all documents submitted with this response, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted with this response are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that for one year from the date of the Information Request, I am under an obligation to supplement my response to the Information Request if any additional information relevant to the matters should become known or available to me.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this ____ day of _____, 2025.

Notary Public