



July 18, 2025

Alan Harder
Public Works Director
City of Amarillo Public Works Department
Municipal Solid Waste (MSW) Landfill
16250 Bezner Drive
Amarillo, TX 79124

Sent via email: alan.harder@amarillo.gov

Re: Corrective Action Plan (CAP) Request – 40 Code of Federal Regulations (CFR) Part 62 Subpart OOO – Federal Plan Requirements for Municipal Solid Waste (MSW) Landfills – 40 CFR Part 63 Subpart AAAA – National Emission Standards for Hazardous Air Pollutants (NESHAP) for MSW Landfills – Landfill Gas Collection and Control System (LGCCS) Blower/Flare Unit – City of Amarillo MSW Landfill, 16250 Bezner Drive, Amarillo, Potter County, Texas 79124

Dear Mr. Harder:

This letter is in response to the request submitted by HDR Engineering (HDR) on behalf of the City of Amarillo (City) dated December 6, 2024, with subsequent additional information provided on February 28, 2025, and April 22, 2025, for approval of the CAP and implementation schedule regarding wellhead pressure exceedances caused by a persistent and ongoing malfunction of the blower/flare station at the City's MSW Landfill. The United States Environmental Protection Agency (EPA) conditionally approves your CAP request, as specified in this letter¹.

The facility operates under the regulatory framework of the Federal Plan Requirements outlined in 40 CFR Part 62 Subpart OOO, and additionally subject to the requirements of 40 CFR Part 63 Subpart AAAA. Since mid-September 2024, the ongoing malfunctions and resulting equipment failures have

¹ While Texas is delegated NESHAP AAAA and is the delegated permitting authority, the state is not currently delegated for Part 62 Subpart OOO and the EPA federal plan is in effect. Therefore, EPA is the primary enforcement authority for ensuring compliance with Subpart OOO requirements.

caused a significant chain of events, leading to repeated non-compliance with critical operational standards, specifically 40 CFR 62.16714(b)(2)(iii) and 40 CFR 63.1959(b)(2)(ii)(B)(3), which mandate negative pressure at landfill gas wellheads. By October 2024, monitoring revealed that 43 wellheads were exhibiting excess positive pressure, directly attributable to the inoperable blower/flare station. The City's request for approval of the CAP and associated implementation schedule was made pursuant to 40 CFR 62.16724(k)(1) and 40 CFR 63.1981(j), as the anticipated completion of all corrective actions is expected to exceed 120 days from the initial exceedance dates.

The root cause of the malfunctions, identified through a March 2024 Integrated Power Service (IPS) vibration study and subsequent analysis, includes multiple contributing factors, such as blower motors being over-greased to the point of lubrication inundation in the windings, a broken cooling fan on Blower #2, cracked Omega drive couplings, and gross misalignment between the blowers and their inlet/outlet piping which led to excessive strain on the blower housings. To address these issues, the City proposed implementing a multi-phased approach, which involved the delivery and installation of a temporary rental blower/flare unit in March 2025 by Parnel. After the temporary rental blower/flare was installed, there were several weeks of troubleshooting and startup activities to promptly restore and ensure compliant wellhead readings and vacuum to the well field. The original target completion date was July 1, 2025. However, the wells were returned to compliance in March 2025.

Additionally, the City also proposed permanent repairs which entail the replacement of drive motors, bearings, and blower drive couplings, followed by precision laser alignment of the new and existing equipment. These permanent repairs have an estimated lead time of 20-22 weeks for parts due to supply chain issues, with an anticipated scheduled shut down for full replacement in August 2025.

In an email dated July 15, 2025, HDR Inc. provided a status update and completed well exceedance root cause analysis forms on behalf of the City for completion of the following corrective actions:

- All wells were returned to compliance as of March 8, 2025.
- The temporary blower installed and operated beginning on March 18, 2025, is still operational.
- There have not been any malfunctions, excess emissions, or other
- There has not been any unscheduled shut down or maintenance since April 2025.
- The new permanent blowers for the flare station have been purchased and are being coated and assembled.
- The anticipated time frame for flare station shut down to complete the permanent replacement and other repairs is the week of August 11, 2025.

Based on the information and supporting data submitted, EPA conditionally approves the City's request to implement the proposed CAP and associated implementation schedule for addressing the landfill gas wellhead exceedances at the facility and the underlying equipment failures, as detailed in the City's

correspondence and submissions. Furthermore, the City's obligation to operate and maintain the landfill, including associated air pollution control equipment and monitoring equipment, and as reported pursuant to 40 CFR 62.16724(h), must continue to ensure that, during any GCCS malfunction or shut down, all landfill gas is automatically directed to the flare or the actuated valve is self-closed, preventing any uncombusted landfill gas from being released to the atmosphere.

EPA's conditional approval of the CAP and the proposed implementation schedule is site-specific for the City of Amarillo MSW Landfill, and is contingent upon the City's operations remaining consistent with the details and plans presented in the submitted CAP. Should any significant changes to the landfill operations occur that are inconsistent with these representations, the City must document the change(s) and submit a request for approval to modify the CAP. A copy of the CAP and EPA's approval will also be sent to the Texas Commission on Environmental Quality to be incorporated in the facility's Title V General Operating Permit for federal enforceability. Please direct questions regarding this conditional approval to Diana Lundelius of my staff at (214) 665-7468 or lundelius.diana@epa.gov, or to Kevin Kim, (214) 665-8554 or kim.kevin@epa.gov.

Sincerely,

Steve Thompson
Manager
Air Enforcement Branch

ecc: Michale Padilla (City of Amarillo), michael.padilla@amarillo.gov
Joel Miller (HDR Engineering, Inc), joel.miller@hdrinc.com
Chelsea Williams (HDR Engineering, Inc), chelsea.williams@hdrinc.com
Kevin Kim (EPA Region 6), kim.kevin@epa.gov
Andrew Kuklish (TCEQ), andrew.kuklish@tceq.texas.gov