



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation (FCE)
Salina Municipal Solid Waste Landfill
4292 S Burma Road
Salina, Kansas 67401
FRS# 110012154685

Mailing address :
300 W Ash Street, Salina, Kansas, 67401

Inspection Date(s):
March 8, 2022

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Authorized for Release by:

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APPENDICES

- A Photo log and photos (4 pages)
- B September 2021 Initial design capacity report (82 pages)
- C Receipt of Documents (1 page)
- D KDHE January 27, 2021, Compliance Report (6 pages)
- E February 23-25, 2021, NMOC report (58 pages)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act, Section 111, New Source Performance Standards (NSPS) and implementing regulations in the code of federal regulations (CFR). The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Compliance Initiative.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Lead Inspector Avery Bowers	EPA, Region 7, ECAD	Environmental Engineer
Joe Terriquez	EPA, Region 7, ECAD	Environmental Engineer
Jessica Fair	Kansas Department of Health and Environment (KDHE)	Environmental Compliance and Regulation Specialist

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Danny Couch, Landfill Operator		
Larry Hammonds, Superintendent	785-826-6658	Lawrence.hammonds@salina.org
Britt Keller, Landfill Operator		

FACILITY OVERVIEW

Salina Municipal Solid Waste Landfill (here after referred to as "Salina Landfill") has a Standard Industrial Classification (SIC) code of 4953 and is categorized as a refuse system and a North American Industry Classification System (NAICS) code of 562212 and is categorized as solid waste landfill. EPA personnel had not been at the facility within the last five years. The three most recent Kansas Department of Health and Environmental (KDHE) compliance monitoring activities included a partial compliance evaluation via stack test review conducted on February 25, 2021, an on-site FCE conducted on January 27, 2021, and an on-site FCE conducted on February 18, 2020. Salina Landfill's Title V operating permit, issued by KDHE, states the facility is subject to the following regulations and standards (**Tables 3 & 4**):

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General provisions
40 CFR Part 61	Subpart A, General provisions
40 CFR Part 61	Subpart M, National emission standards for asbestos
40 CFR Part 62	Subpart OOO, Federal plan requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014, and have not been modified or reconstructed since July 17, 2014
40 CFR Part 63	Subpart CCCCCC, National emission standards for Hazardous Air Pollutants for source category: Gasoline dispensing facilities

Table 4. APPLICABLE REGULATIONS AND STANDARDS	
Kansas Administrative Regulations	Standard Name
K.A.R. 28-19-647(h)	Open burning
K.A.R. 28-19-210	Calculation of actual emission
K.A.R. 28-19-650	Opacity limits
K.A.R. 28-19-720	New source performance standards
K.A.R. 28-19-735	National emission standards for hazardous air pollutants
K.A.R. 28-19-750	Hazardous air pollutants; maximum achievable control technology

FACILITY OPERATIONS SUMMARY

Since its approval in 1976, the Salina Landfill has been owned and operated by the City of Salina. Of the 656 acres allotted, the landfill is permitted by KDHE to use 289 for waste disposal; 66 acres of the landfill are pre-subtitle D landfill areas and were closed in 1995. Cells 1 and 2 were closed in 2004. In 2014 a leachate detention pond was built to manage the leachate. The landfill operates Monday-Friday from 7:00 am until 4:30 pm and on Saturday from 8:00 am until 2:00 pm. The staff consists of 10 employees and the superintendent. The facility accepts scrap metal, rock, concrete, friable and non-friable asbestos, and approved contaminated soil. KDHE approved the facility to burn yard waste on-site.

FIELD ACTIVITIES SUMMARY

On March 8, 2022, Mr. Terriquez and I met with Ms. Fair around 12:30 at a designated location to calibrate the Toxic Vapor Analyzer (TVA). Once calibrations were completed, we arrived at the Salina Landfill at approximately 1:28 pm. I introduced myself and members of the inspection team to Danny Couch. I explained that the purpose of the visit (described above in **Inspection Objective and Tables 3 and 4**). I explained that after asking for some general business information, I would observe work practices, process units, emission units, control equipment and review associated records demonstrating compliance with the standard, permit, regulation.

Mr. Couch informed us that Britt Keller would be able to help with our inspection intentions and when Mr. Keller arrived, I re-iterated our purpose. Mr. Keller led us to the landfill burn site where they were actively burning yard waste (**Appendix A**, photos 1&2). At 2:10 pm Mr. Hammonds joined the inspection, and we toured the landfill. Due to the nonmethane organic compounds (NMOC) emission rate falling below the 34 Mg/yr threshold, the facility did not trigger the requirement to conduct surface emission monitoring in of 40 CFR Part 62 Subpart OOO [62.16714(e)(2)]. Mr. Terriquez did use the Forward Looking Infrared (FLIR) camera to observe parts of cells 2A and 2B. While touring the landfill I asked Mr. Hammonds questions pertaining to landfill operations, the NMOC calculation and values, and how the landfill maintains cover integrity. We completed the landfill walkthrough at 3:00 pm and returned to the Salina Landfill office to obtain and review records. Ms. Fair departed the facility at this time.



Figure 1. On-site burning area

While in the office I reviewed the following records and asked for one to be electronically sent (noted with an asterisk).

1. Reviewed records of tonnage of solid waste received within the past 2 years
2. Reviewed the random load inspection of incoming loads
3. Reviewed the recording procedure for load inspection forms
4. Reviewed the training of landfill staff to recognize hazardous and liquid wastes
5. Reviewed the state and local permits obtained before open burning events

6. Reviewed the site stormwater management plan
7. Reviewed the Tier 2 NMOC calculation report from 2020 and 2021.
8. Asked for the initial design capacity report to be submitted electronically and received the electronic version March 10, 2022 (**Appendix B**)

I concluded the records review at 4:15 pm and conducted my closing conference. I explained Mr. Hammonds' right to claim any information as confidential business information (CBI) but he declined and said nothing we spoke about was proprietary. After reviewing the photos taken, Mr. Hammonds signed the receipt of documents (**Appendix C**). Mr. Terriquez and I departed the facility at 4:30 pm.

Measurement and/or Sampling Activities

No measurements or sampling were conducted.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix B**. I made the following observations during inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

Although I made several notable observations (below) none of my observations are listed as potential findings of noncompliance in this report. These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

The Salina Landfill is required by 40 CFR 60.752(b)(1) to perform annual test to calculate the NMOC emission rate. While on site, I reviewed the Tier 2 NMOC calculation performed on March 23, 2020, and the report stated the value was 24.31 Mg/yr which was below the 50 Mg/yr value under the WWW requirements. **Appendix D** is a compliance report from KDHE which confirms the Tier 2 NMOC values I saw while on site.

The Salina Landfill is required by 40 CFR 60.752(b)(1) to perform an annual test to calculate the NMOC emission rate. Prior to the inspection, I reviewed the Tier 2 NMOC calculation test performed from February 23, 2021, through February 25, 2021, and the report stated the value for NMOC emission rate was 17.9 Mg/yr which was below the 50 Mg/yr value under the WWW requirements (**Appendix E**).

The facility is required by 40 CFR 62.16724(a) to submit an initial design report since the new Subpart OOO standards became effective on May 21, 2021. On March 10, 2022, I received an electronic version of the initial design capacity report (**Appendix B**). It included the Tier 2 NMOC calculation test performed from February 23, 2021, through February 25, 2021, and the report stated the value NMOC emission rate was 17.9 Mg/yr which was below the 50 Mg/yr value under the OOO requirements.