



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

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Noble Hill Sanitary Landfill

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Inspection Date(s):

September 17-18, 2024

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Avery Bowers, Inspector, ECAD, Air Branch

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APPENDICES

- A – Signed Receipt of Documents (1 page)
- B – Noble Hill Sanitary Landfill Field photo log (36 pages)
- C – TVA Methane Exceedance Log (1 page)
- D – Signed CBI form (1 page)
- E – Noble Hill TVA data (83 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 (CAA), specifically those requirements listed in **Table 1**. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Mitigating Climate Change National Enforcement Compliance Initiative. This report documents EPA's activities on site.

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General Provisions
40 CFR Part 60	Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR Part 60	Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but Before July 18, 2014 <i>Applicable from March 12, 1996, through June 20, 2021</i>
40 CFR Part 60	Subpart XXX, Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014 <i>Applicable from July 28, 2021, and still applicable.</i>
40 CFR Part 61	Subpart M, National 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 <i>Applicable from June 21, 2021, through July 27, 2021</i>
40 CFR Part 63	Subpart AAAA—National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills <i>Applicable from March 17, 2020, and still applicable</i>
40 CFR Part 63	Subpart CCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
40 CFR Part 63	Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Table 2 lists the inspection team members.

Table 2. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Avery Bowers	EPA Region 7, ECAD, Air Branch	Lead inspector
Bailey Dietz, Environmental Program Analyst	Missouri Department of Natural Resources (MoDNR), Southwest Regional Office	Field team member

FACILITY CONTACT INFORMATION

Table 3 lists the primary facility contacts in order of contact during the inspection.

Table 3. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Chris Pokorny, Landfill Supervisor	(417) 742-4536	cpokorny@springfieldmo.gov
Dan Jessen, Superintendent of Solid Waste for the City of Springfield	Did not obtain during inspection	djessen@springfieldmo.gov
Sonny Decker, Environmental Specialist	(417) 742-9843	sdecker@springfieldmo.gov
Austin Evans, Environmental Specialist	Did not obtain during inspection	aevans@springfieldmo.gov
Marilyn Jones, SCS Engineers Consultant	(816) 752-7900	mjones@scsengineers.com
Jeff Morris	Did not obtain during inspection	Jeff.morris@springfieldmo.gov
Alex Love	Did not obtain during inspection	Did not obtain during inspection

FACILITY OVERVIEW

Springfield Noble Hill Sanitary Landfill (Noble Hill) was purchased by the city of Springfield in 1975. The landfill had an original design capacity of 4.04 million cubic meters. In 1996, the facility underwent a vertical expansion. In 2007, the facility installed a voluntary gas collection and control system (GCCS) to address gas migration and odors. By 2015, the facility's design capacity had increased to 8.83 million megagrams (Mg). The facility's voluntary GCCS had expanded to 80 gas wells and one flare. Noble Hill Landfill Renewable Energy Center was also installed in 2015. The installation would treat the gas generated from the landfill and use the treated gas in electric generating units. Up until November 2023, the Energy Center operated under a separate permit and was owned by a separate entity. On August 26, 2020, the facility was issued a permit approval to expand the landfill design capacity by 21,926,372 Mgs. The voluntary GCCS had been expanded to 93 gas wells by August 2020 and still contained one flare. The new design capacity of the landfill would be 29,958,852 Mgs.

On July 28, 2021, the facility commenced construction of the expansion area, and the facility became subject to Subpart XXX. The facility submitted its amended design capacity report under Subpart XXX on September 20, 2021, to the EPA. In the amended design capacity report, the landfill's nonmethane organic compound (NMOC) emission rate had exceeded the 34 Mg/year threshold established in Subpart XXX. This triggered the facility's GCCS from being voluntary to being mandatory. Per 40 CFR 60.764(a)(2)(ii)(A), the facility submitted its GCCS plan to Missouri Department of Natural Resources (MoDNR) in September 2022. According to 40 CFR 60.762(b)(2)(ii) and 60.764(a)(3)(iv)(A), the facility was required to install and operate a gas collection and control system within 30 months per § 60.762(b)(2)(ii) and (iii). The 30-month deadline was March 20, 2024. On August 6, 2024, the facility received a construction

permit approval for a new flare with a 4,000 standard cubic feet per minute (scfm) flowrate. According to this construction permit, the facility had expanded the GCCS to 93 gas wells.

The landfill operates Monday through Friday from 7 a.m. to 4 p.m., and Saturday from 7 a.m. to 3 p.m. According to Mr. Pokorny, the facility has about 24 employees in total. No ownership changes have occurred within the last five years.

The last onsite compliance monitoring activities at the facility were on July 29, 2021, and April 14, 2023, and consisted of two FCE inspections conducted by MoDNR. MoDNR completed a Title V certification review on January 27, 2022, January 12, 2023, and April 2, 2024.

According to EPA's Enforcement and Compliance History Online (ECHO) website, there has been no formal or informal enforcement at this facility for at least the past five years.

According to Noble Hill's Title V operating permit issued by MoDNR on November 5, 2015¹, the facility is subject to the regulations and standards subject to review during this inspection as noted in **Table 1**.

FACILITY OPERATIONS SUMMARY

Noble Hill is a municipality owned landfill located in Greene County. The facility has a Standard Industrial Classification (SIC) code 4953, categorized as Refuse Systems, and a North American Industry Classification System (NAICS) code 562212, categorized as Solid Waste Landfill. The landfill collects municipal solid waste from the city of Springfield. The waste is usually hauled by small dump trucks, packer/roll off trucks, tractor-trailers, and pickup trucks. The waste is placed in the active area and compacted with heavy equipment to reduce the volume. The compacted waste is covered on a routine basis with soil obtained from other parts of the landfill. As the waste decomposes, the landfill produces gas that is mostly composed of methane, carbon dioxide, and trace amount of nonmethane organic compounds (NMOC). The landfill's other air pollutants come from the vehicular travel on the paved and unpaved roads at the property. The gas collection system was initially installed to control subsurface landfill gas migration and odor, but now is mandatory to reducing greenhouse gas emissions. **Figure 1** shows the most updated map of the landfill and its future expansion plans. As of the date of the inspection, according to Mr. Decker and Mr. Evans, the landfill has about 140 to 145 total wells.

¹ The facility is currently under permit shield and is in the processing of getting a new Title V operating permit issued to it.

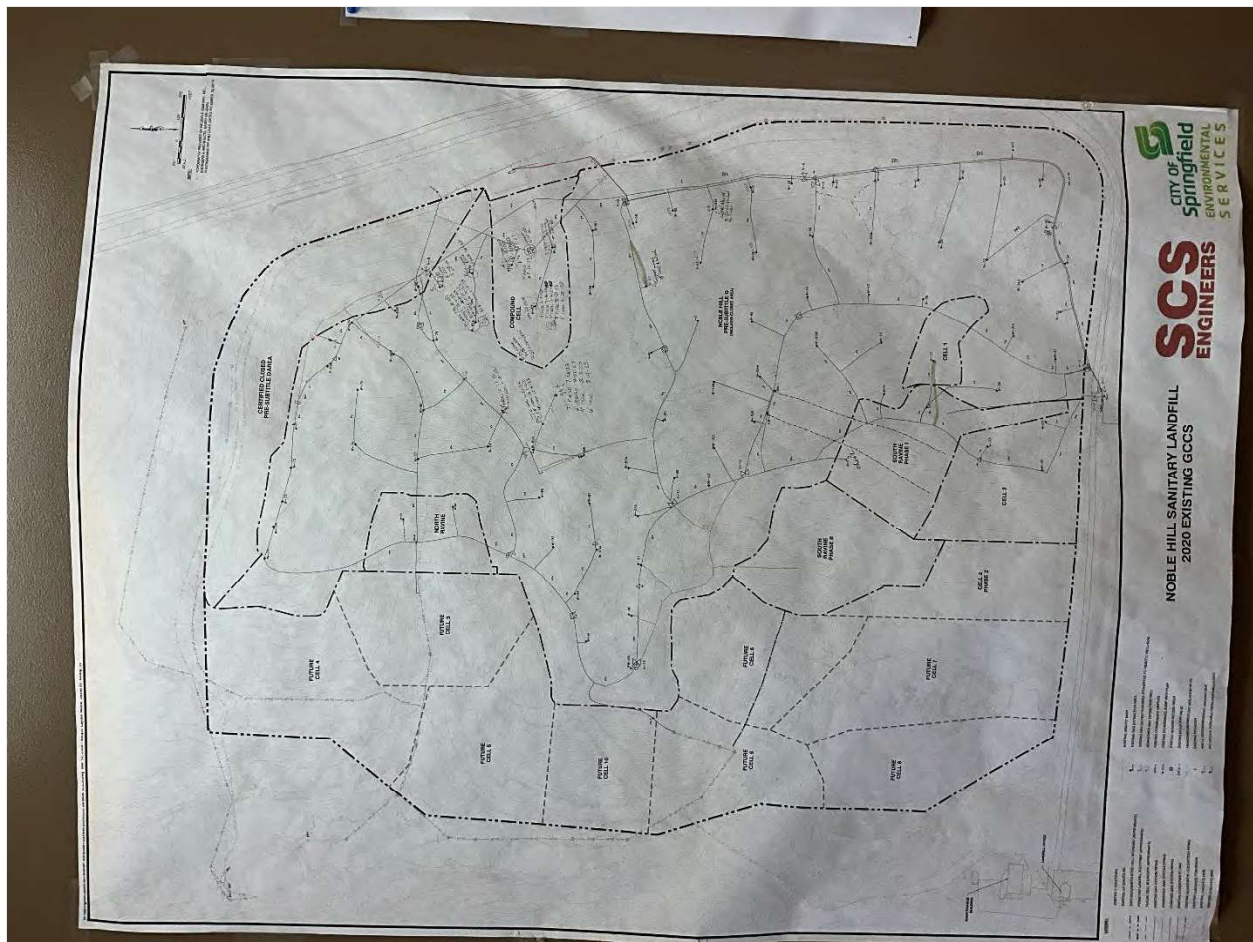


Figure 1. Current Site Map for Landfill

FIELD ACTIVITIES SUMMARY

I arrived at the front gate on September 17, 2024, at 10:04 a.m. and completed a drive by surveillance inspection. I drove by the flare at 10:10 a.m. and saw a flame and no other visible emissions. I made entry at the front office at 10:15 a.m. where I was greeted by Mr. Pokorny. I introduced myself, presented my credentials, and provided my business card to Mr. Pokorny. We entered the office, and Mr. Pokorny called Sonny Decker. Dan Jessen, the superintendent of solid waste for the City of Springfield, arrived at 10:37 a.m. Mr. Decker and Mr. Evans arrived at 10:41 and 10:42 a.m. respectively. Once all the gentlemen were in the office, I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1**. I explained that after asking for some general business information, I would observe work practices, process units, emission units, control equipment, possibly conduct comparative surface emission monitoring if the facility was subject, and review associated records demonstrating compliance with the Title V permit and federal regulations. I explained to the gentlemen that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection. From 10:46 a.m. to 11:55

a.m. I asked them general questions about the facility. At 10:55 a.m., Mr. Jessen called Ms. Jones to help answer those questions. Ms. Jones provided many answers, and Mr. Jessen ended the call at 11:24 a.m. Mr. Decker and Mr. Evans left the office at 11: 25 a.m. The information acquired from the conversation is detailed in the inspection observation section of this report. During the conversation, I obtained copies of the facility's contractors' most recent surface emission monitoring data and diesel purchase record as indicated on the Receipt of Documents **(Appendix A)**.

At 11:55 a.m., I was given a facility tour by Mr. Pokorny and Mr. Jessen. I was asked to wear my high visibility jacket per the facility's safety protocol. I took photos of the landfill and the associated equipment on the landfill from 12:00 p.m. until 12:50 p.m. **(Appendix B)**. We broke for lunch at 12:59 p.m., and I returned to the office at 2:10 p.m. I continued the inspection with records review at 2:15 p.m. IMG_0324.JPG – IMG_0330.JPG are some examples of records that I reviewed. At 3:30 p.m., I told the facility I would return in the morning to conduct comparative surface emission monitoring (SEM) and finish completing the records review. I departed the facility for the day at 3:35 p.m.

On September 18, 2024, Ms. Dietz met me at a designated location at 9:15 a.m. I began the calibrations for the Toxic Vapor Analyzer (TVA) at 9:28 a.m. Ms. Dietz and I arrived at the facility office at 10:22 a.m. Two employees, Mr. Morris and Mr. Love, were to accompany Ms. Dietz and me on the landfill as I conducted my comparative SEM. Mr. Morris and Mr. Love arrived at 10:28 a.m. I completed the TVA calibrations at 11:25 a.m. The gentlemen informed me that I would need my hard hat to traverse the landfill. After I put on the required safety gear, the four of us drove to the landfill to start the comparative SEM². I began the TVA data logger at 11:34 a.m. which collected data every two seconds. I started surface emission monitoring at Well 121. I informed Mr. Morris and Mr. Love that I would monitor parts of the same areas that the contractors had done the previous two days. **Figure 2** depicts the methane exceedances the contractors detected and some of the areas of landfill I surveyed.

² Site sampling activities are described in the Measurement and/or Sampling Activities section below.

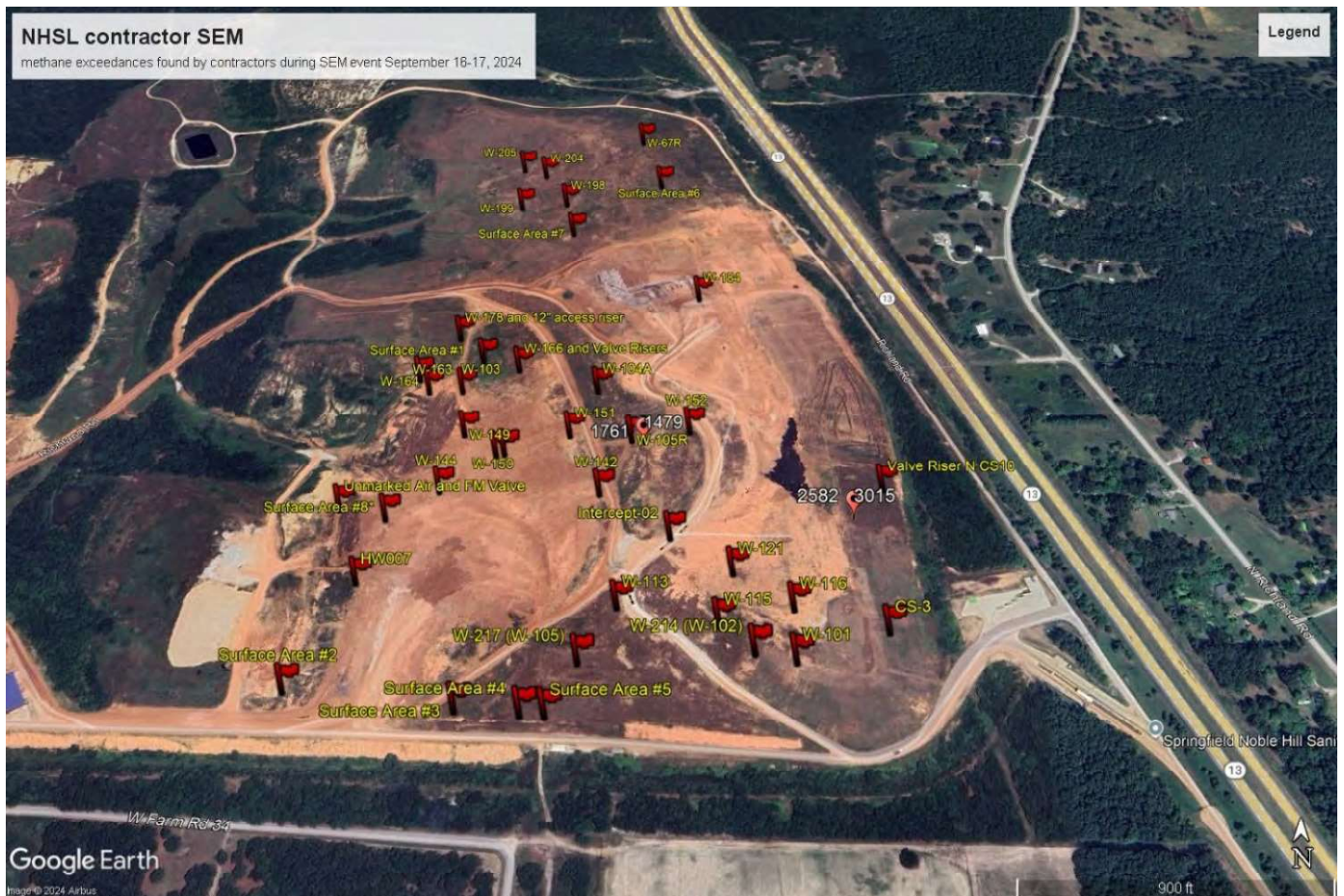


Figure 2. Noble Hill Sanitary Landfill contractor surface emission monitoring results

We took lunch from 12 p.m. to 12:35 p.m. I performed a bump check to ensure the TVA was calibrated and reading the gases correctly during our lunch break. The instrument was working properly so I continued my SEM of the landfill after lunch concluded. While I monitored, Ms. Dietz used red flags to mark the exceedances the TVA was detecting, and she wrote them down in the log I provided her (**Appendix C**). The TVA detected a total of three exceedances. The first exceedance was already identified by the contractors the previous day. **Figure 3** depicts the two other methane exceedances I found that the contractors did not detect. **Figure 4** depicts all the areas of the landfill that I monitored.



I finished SEM at 2:17 p.m. We arrived at the conference room at 2:21 p.m., and Mr. Jessen was already present. I continued the records review. Mr. Jessen called Ms. Jones at 2:28 p.m. to help answer the questions about the facility's Tier 2 NMOC emission rate reports. I finished the records review at 2:45 p.m. Mr. Pokorny arrived at 2:46 for the closing conference. I conducted a closing conference with Messrs. Jessen, Pokorny, Love, and Morris present. Ms. Jones was present via phone call. I reiterated to the facility members that the facility could make a claim of business confidentiality and provided Mr. Jessen with a Confidential Business Information (CBI) form. Mr. Jessen did not make a claim of confidentiality (**Appendix D**). I did not leave the facility with a Notice of Potential Findings. I departed the facility after the closing conference concluded.

Observations and potential findings from the facility tour, records review, and sampling/measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

Measurement and/or Sampling Activities

I conducted field measurements via Method 21 as required by 40 CFR Part 60, Subpart XXX. **Table 4** summarizes field measurements that were above the 500-ppm threshold for methane logged by the TVA. All the location identifiers in the table are well ID numbers instead of latitude and longitude coordinates for accuracy. Additional information can be found in the facility site folder. All environmental measurement activities were performed in accordance with the EPA Region 7 quality system. I used the same TVA for all measurements, and I followed manufacturer and EPA processes for instrument calibration. Instrument calibration was documented on the calibration sheet located in the facility site file. **Appendix E** contains all the recorded TVA data.

All environmental measurement activities were performed in accordance with the EPA Region 7 quality system. I followed manufacturer and EPA processes for instrument calibration; instrument calibration was documented on the calibration form found in the site file folder.

Table 4 summarizes field measurement activities.

Table 1. FIELD MEASUREMENT ACTIVITIES				
Location Identifier	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	PPM	Measurer Name
Well 132	9/18/24 12:36 p.m.	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks. Region 7 Procedure: Toxic Vapor Analyzer (TVA) Equipment: Thermo Fisher Scientific TVA-2020 (TVA-2020) serial number: 202022106267	1,098	Avery Bowers

Table 1. FIELD MEASUREMENT ACTIVITIES				
Location Identifier	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	PPM	Measurer Name
Well 136	9/18/24 1:20 p.m.	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks.	1,669	Avery Bowers
Well 105 (R)	9/18/24 2:08 p.m.	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks.	1.28% (10,280)	Avery Bowers
¹ The current version of each procedure, at the time of the investigation, was followed.				

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

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

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.

EU (emission unit) 16, the 100 kW backup generators, are subject to 40 CFR Part 60 Subpart IIII.

Per 40 CFR 60.4207(b), the facility is required to use low sulfur diesel for the emergency generators. The facility provided me a copy of the receipt for the low-sulfur diesel purchased. Mr. Pokorny provided me the manufacturers' manuals for the generators, and I reviewed the manuals. During the records review on the first day, I noted that the emergency generators could only be operated for 100 hours if it was related to testing and maintenance. Mr. Pokorny provided me logs of when the engine runs for maintenance. The logs indicated that the engines ran for 20 minutes/week. This totaled about 1,040 minutes/year. This is equivalent to roughly 17.33 hours/year that the generators operate for maintenance and testing purposes. The facility stated it has not had to use the emergency generators in an emergency. The facility does not have a way of recording and showing when the engines do run for emergency purposes. See potential finding #1 for more details.

EU-01, Sanitary Landfill, is subject to 40 CFR Part 60 Subpart WWW, XXX, 40 CFR Part 62 Subpart OOO, and 40 Part 63 Subpart AAAA

60.760 Applicability, designation of affected source, and delegation of authority.

Ms. Jones stated that on March 15, 2019, the MoDNR Solid Waste Program approved a lateral expansion for the landfill. MoDNR's Air program approved the air construction permit on August 26, 2020. The construction commenced on July 28, 2021, making the facility subject to Subpart XXX regulations. Missouri is the delegated authority for Subpart XXX.

Ms. Jones provided the facility's revised September 20, 2021, design capacity report via email on September 17, 2024. The report indicated that the facility's NMOC was 43.24 Mg/yr.

Noble Hill is a landfill with a design capacity of 29,430,624 Mg. This exceeds the 2.5 million Mg threshold. As such, the facility was also subject to the NSPS Subpart WWW and OOO prior to the expansion. Due to the expansion, the facility is no longer subject to those requirements. It is currently subject to NESHAP Subpart AAAA because it is co-located to a major source: Noble Hill Landfill Renewable Energy Center³.

60.762 Standards for air emissions from municipal solid waste landfills.

As mentioned above, the facility's reported NMOC is 43.24 Mg/yr which is less than 50 Mg/year, so the facility does not have to meet the requirements for the GCCS operation and compliance provisions in Subpart AAAA. While I was on-site, Ms. Jones notified me that the facility will begin complying with provisions of 63.1958, 63.1960, and 63.1961 to demonstrate compliance with Subpart XXX. 40 CFR 60.762(b)(2)(iv) states that once a facility has opted into demonstrating compliance under the operation and compliance provisions of Subpart AAAA, the facility cannot return to demonstrating compliance in the provisions listed in 60.763, 60.765, and 60.766. For the future SEM events (occurring after September 16 & 17, 2024), the facility will comply with Subpart AAAA.

Per 40 CFR 60.762(c), Noble Hill is required to have a Title V operating permit. Noble Hill's most recent Title V operating permit was issued on November 5, 2015. The facility submitted a permit renewal to incorporate all its new changes. The renewal is still in the process of being approved, and the facility is functioning under a permit shield.

After the landfill expanded in July 2021, Noble Hill recalculated its NMOC emission and submitted the amended design capacity report on September 20, 2021. The report stated the NMOC emission rate exceeded the 34 Mg/yr threshold established in 40 CFR 60.762(b)(2)(i), and the facility had to continue operating its GCCS but according to Subpart XXX standards now.

The facility is required to control the gas collected from within the landfill with control devices meeting the requirements listed in 60.762(b)(2)(iii). The facility can also route the collected gas

³ Noble Hill Landfill Renewable Energy Center is a major source of formaldehyde after a stack test was done March 17, 2020, and the results verified.

to a treatment system that processes the collected gas for subsequent sale or beneficial use such as fuel for combustion, production of vehicle fuel, production of high-Btu gas for pipeline injection, or use as a raw material in a chemical manufacturing process. During the inspection, Mr. Pokorny stated that the gas collected is routed to the flare that has a maximum flowrate of 2,000 scfm. He stated that once the new 4,000 scfm flare arrives on-site, gets properly installed, and passes the initial performance tests, the facility would begin to use that flare and decommission the smaller flare. The facility anticipates that the new flare will be delivered in October, and operation will begin in February 2025. Mr. Jessen stated that the facility acquired the Noble Hill Landfill Renewable Energy Center in November 2023. He stated the facility has not been running the energy center since its acquisition.

60.763 Operational Standards for collection and control systems. (Effective after March 20, 2024, due to 30-month deadline)

The facility is required to operate the gas collection system with negative pressure at each well per 60.763(b). Ms. Jones submitted the facility's monthly wellhead data from March 20, 2024, through September 9, 2024. I reviewed the data and noticed that there were 17 instances in which wells exhibited positive pressure. The positive pressure was remediated the same day or within 15 days. 40 CFR 60.763(b)(3) states that a well may experience a static positive pressure after shutdown to accommodate declining flows. Ms. Jones stated that she would give me information about the decommissioned wells on site. Currently there are 44 wells that have been abandoned, and some of those have exhibited positive pressure.

The facility is required to operate each interior wellhead in the collection system with a landfill gas temperature less than 131°F per 40 CFR 60.763(c). On September 17, 2024, via email, Ms. Jones submitted the facility's monthly wellhead data from March 20, 2024, through September 9, 2024. I reviewed the data and noted that there were zero instances in which wells exhibited temperatures greater than 131°F.

The facility is required to operate the system so that methane concentrations are less than 500 ppm as evidenced by conducting surface testing using an organic vapor analyzer, flame ionization detector, or other portable monitor per 40 CFR 60.763(d). 40 CFR 60.763(d) also states the landfill may also exclude SEM for areas with steep slopes or other dangers. According to Messrs. Pokorny, Jessen, and Decker, no areas on the landfill exhibit steep slopes or dangers. Ms. Jones sent the facility's SEM methane exceedance report for the event occurring September 16 and 17, 2024. She has not sent the full report which would include the instruments used and the calibration data for the instruments. Although I asked for the first SEM event report to be emailed to me, she has not yet sent the data. She did state that it was

submitted via hard-copy snail-mail on September 16, 2024. Ms. Jones did not clarify if the report was sent to MoDNR, EPA, or both entities.

60.765 Compliance provisions.

To demonstrate compliance with the operating parameters for pressure, the facility must measure the pressure in the gas collection header for each individual well. If positive pressure exists, the facility must take corrective action within five days per 60.765(a)(3). If negative pressure cannot be achieved within 15 days, the facility must conduct a root cause analysis per 60.765(a)(3)(i). I reviewed the facility's monthly wellhead data from March 20, 2024, through September 9, 2024. The data indicated that there were 17 readings of positive pressure. The data showed that corrective action was initiated within five days. None of the 17 wells needed more than 15 days to achieve negative pressure again.

To demonstrate compliance with the operating parameters for temperature, the facility must monitor the temperature at each well monthly per 60.765(a)(5) and initiate corrective action within five days if temperatures are above 131°F. I reviewed the facility's monthly wellhead data from March 20, 2024, through September 9, 2024. No well exceeded the temperature threshold.

To demonstrate compliance with the operating parameters for the collection system, the facility must conduct SEM quarterly per 60.765(c)(1). The facility has only had to conduct two SEM events since becoming applicable to the Subpart XXX standard for GCCS. According to Ms. Jones and Mr. Jessen, the facility is doing the quarterly SEM required. I have only received data for the second SEM event that occurred September 16 and 17, 2024. During the SEM events, the facility must also mark any exceedance above the 500-ppm threshold with the concentration recorded per 60.765(c)(4)(i). Cover maintenance or adjustments must be made, and the area re-monitored within 10 days of the exceedance. If the location shows a second exceedance, the facility must take additional corrective action and the location must be re-monitored within 10 days of the second exceedance. If re-monitoring shows the same location exceeding 3 times, a new well or collection device must be installed within 120 days of initial exceedance or alternative remedy must be submitted and approved by the administrator. If a location initially shows an exceedance but the 10-day re-monitoring does not show an exceedance, the facility must re-monitor again one month from the initial exceedance. If the one-month re-monitoring shows an exceedance greater than 500 ppm, the facility must re-monitor that location again within 10 days per 60.765(c)(4)(iv). In several follow-up emails from October 4 - 7, 2024, Ms. Jones stated that the facility did perform 10-day and 20-day rechecks for the methane exceedances found during the second SEM event. I have not received full detailed reports on either SEM event to give sufficient observations about the exceedances.

The facility must also implement a program to monitor for cover integrity and implement cover repairs as necessary monthly per 60.765(c)(5). During the inspection, Mr. Decker provided the cover integrity checklist. He also stated that the stormwater pollution protection plan checks coincide with the monthly cover integrity checks. I requested copies of the cover integrity checklist but have not received them to the date of this report.

60.766 Monitoring of operations.

The facility is meeting the requirements for monitoring the pressure, temperature, and oxygen in each well monthly. On September 17, 2024, Ms. Jones emailed me the well field data.

During the inspection, Mr. Pokorny stated the facility monitors flow to the flare. He also informed me there is no bypass on the flare, so bypass records required per 60.766(c)(2) are not applicable. The flare's highest flow rate value was 1,890 scfm. The facility's current flare has the maximum capacity to burn landfill gas at a flowrate of 2,000 scfm. Mr. Pokorny stated that the facility uses Perennial Energy as the contractor for maintaining the flare. The facility provided the flare maintenance logs and manual per 60.766(c) (**Appendix B**, IMG_0325.JPG). The facility also provided the visible emission logs for the flare.

60.767 Reporting requirements.

The facility is required to submit an amended design capacity report per 60.767(a)(3) and an NMOC emission rate report per 60.767(b). The amended report was submitted to MDNR on September 20, 2021, along with the NMOC report. Mr. Evans and Ms. Jones also submitted copies of the design capacity report and NMOC emission rate reports to me on September 17, 2024, via email.

The facility is required to submit a collection and control system design plan for the administrator to approve per 60.767(c). During the inspection, I asked Mr. Jessen for the approved GCCS design plan. Ms. Jones submitted it via email on September 17, 2024. The GCCS design plan listed alternatives for higher temperature operating values, corrective actions exceeding 60 days, and not hearing back from the administrator. It also states not monitoring wells monthly if it is raised and posing a danger to staff, stating the alternative remedies for SEM methane exceedances that need remediation within 120 days. There are many more alternatives regarding operation, decommissioning of wells, and some compliance provisions.

The facility is required to submit an annual report per 60.767(g). Since the facility recently triggered the mandatory GCCS requirements (eight months ago), there has not been an annual report submitted for the monitoring requirements listed in Subpart XXX.

60.768 Recordkeeping requirements.

The facility is required to keep records for the current amount of solid waste in place and the year-by-year waste acceptance rate. On September 20, 2024, via email, Mr. Jessen provided the waste rates from 2017 through 2024.

EU-01, Sanitary Landfill is subject to 40 CFR Part 61 Subpart M

For the requirements listed in Subpart M, I asked Ms. Pokorny for information regarding the facility's asbestos data. Mr. Pokorny stated a fellow colleague named Eric (no last name provided) said that the landfill had not accepted asbestos since 2018. During the facility tour, Mr. Pokorny pointed out where the asbestos pit was marked. He also emailed me on September 17, 2024, with a map of where the asbestos was located on the landfill. I did not ask for an asbestos manifest sheet since the facility said it had not received any asbestos waste in over six years.

EU-07, 500-gallon unleaded gasoline fuel storage tank, is subject to 40 CFR Part 63 Subpart CCCCCC.

40 CFR 63.11111(c) requires Noble Hill to comply with 63.11117 because the facility has monthly throughput of more than 10,000 gallons of gasoline but less than 100,000 gallons/month. Section 63.11116(a) states the facility must handle gasoline in a manner that will not result in vapor releases to the atmosphere for extended periods of time. I asked Mr. Decker to explain how the facility minimizes the chances of gasoline spills and how the spills are cleaned up. He stated that the facility has a monthly inspection checklist it must follow. IMG_0326.JPG – IMG_0329.JPG depict pages of the facility's spill prevention plan. While on-site, I checked to make sure the gasoline tanks were covered with gasketed seals when not in use. I reviewed the logs for the amount of gasoline the facility dispenses. It is more than 10,000 gallons but less than 100,000 gallons per month.

EU-16, 60 kW backup generator at the scale house, is subject to 40 CFR Part 63 Subpart ZZZZ.

Noble Hill used to own and operate a reciprocating internal combustion engine (RICE) at the scale house. Ms. Jones informed me that the generator was decommissioned, and a new one replaced it two years ago. Ms. Jones provided me information via email on September 17, 2024, about the updated generator. She informed me that the "new 50kW scale house emergency generator is exempt from construction permitting." She provided documentation notifying MoDNR about the new 50 kW (EU-20) generator and its exemption from needing a construction permit, but Ms. Jones did provide information about the facility's compliance with Subpart ZZZZ via email on November 11, 2024. She said the facility complies with Subpart IIII to show compliance with Subpart ZZZZ per 63.6603(e).

Potential Finding 1: Facility failed to keep proper records
Observation Summary: Facility could not provide records for emergency engine generators
Citation: 60.4214(b)
Evidence: conversation with facility personnel
Description of Observation: The facility does not have a way of recording and showing when the emergency engines (EU-16) run for emergency purposes.

Potential Finding 2: Facility failed to meet reporting requirements
Observation Summary: The facility's GCCS plan does not provide a cover integrity program for monthly cover integrity checks and repairs.
Citation: 40 CFR 60.765(c)(5)
Evidence: page 50 of 63 in GCCS design plan
Description of Observation: The GCCS design plan does not offer a cover integrity program to monitor for cover integrity and implement cover repairs as necessary monthly, but instead on a quarterly basis. In the GCCS design plan, the facility states: "This may be performed during surface scan events quarterly to cover those months. During surface scan events, the monitoring technician will look for signs of compromised cover integrity such as stressed vegetation, cracks, and erosion. The inspection will be documented in the surface scan monitoring form and appropriate facility personnel will be notified so that appropriate actions can be taken."

Potential Finding 3: Facility failed to meet reporting requirements
Observation Summary: Facility did not provide acceptable pressure limits in the GCCS design plan
Citation: 60.767(c)(2) & 60.763(b)(2)
Evidence: page 41 of 63 in GCCS design plan
Description of Observation: The facility did not provide the pressure limits for the area where geomembrane or synthetic cover is implemented. The GCCS plan simply states: "A geomembrane or synthetic cover typically retains more gas in the landfill for collection by the GCCS and will not allow migration; therefore, positive pressure is not a concern or indicator of possible migration issues."

End of report.