



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

Air Branch

**Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Central Disposal Systems Incorporated**

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Inspection Date(s):
May 25, 2023

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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, specifically those requirements located in the code of federal regulations (CFR) at 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*. This subpart falls under Section 111 of the CAA, New Source Performance Standards (NSPS) regulations. The facility was targeted for inspection because the EPA sent a letter of noncompliance in August 2022 and the facility claimed “legacy controlled landfill” status in its response, which it believed exempted them from certain reporting requirements. This report documents EPA’s activities on site.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Avery Bowers	EPA, Region 7, ECAD, Air Branch	Lead inspector
Jacob Herbers	EPA, Region 5, ECAD	Field team member
Karina Kuc	EPA, Region 5, ECAD	Field team member
Emma Leeds	EPA, Region 5, ECAD	Field team member

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Jerid Lallak, Landfill Technician		
Ryan Nelson, Environmental Engineer area supervisor	(612) -393-9241	rnelso15@wm.com
Kim Olsen, Receptionist		

FACILITY OVERVIEW

Central Disposal Systems Incorporated (Central Disposal) 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. Prior to the inspection, EPA personnel had not been at the facility within the past five years. The three most recent Iowa Department of Natural Resources (IDNR) compliance monitoring activities include two Title V partial compliance evaluation of records conducted on March 31, 2023, and on March 31, 2022.

IDNR conducted an on-site full compliance evaluation on March 4, 2022. On September 23, 2019, IDNR issued the facility its Title V operating permit. The facility is subject to the following requirements in **Table 3**.

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 61	Subpart M, National Emission Standard 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 AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
40 CFR Part 63	Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

FACILITY OPERATIONS SUMMARY

Central Disposal was constructed in 1972 and began accepting waste October 10, 1972. The landfill is owned and operated by Waste Management of Iowa. The facility submitted its initial design capacity in 1996 and, at that time, the landfill's capacity was 4.5 million cubic meters. The facility submitted an expansion permit application on July 23, 2001, to increase the design capacity to a total of 22.1 million cubic meters. The plan was approved by the IDNR Solid Waste Program, and an amended design capacity report was submitted September 7, 2001. Central Disposal was required to conduct a new Tier 2 nonmethane organic compound (NMOC) emission rate test and the results submitted on March 19, 2002, stated the NMOC emission rate was 72 Megagrams per year. Under 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*, if the design capacity is greater than 2.5 Mg and the calculated NMOC emission rate is equal to or greater than 50 Mg/yr, the installation of a gas collection and control system (GCCS) is required. The GCCS plan was submitted October 2002 and the facility began operating the system at the end of April 2003. Originally, the facility was going to install two passive solar-powered ignition flares, but instead it installed a non-enclosed flare as the control device for the gas collection system. In February 2005, the facility proposed to install six reciprocating internal combustion engines as the new device for using the landfill gas collected. The gas collected from the landfill's gas collection system is treated by a Waste Management facility across the street then is returned to Central Disposal for use in its engines. In March 2006, the engines were installed as part of the gas to energy project. The non-enclosed flare is used as a back-up control device when the treatment system is down or if maintenance is being performed. After installing the GCCS, the

facility is also required to perform quarterly surface emission monitoring (SEM) per 40 CFR 62.16716(d), to ensure the system is operating with methane concentrations less than 500 parts per million (ppm). 40 CFR Part 60, Subpart WWW was superseded by 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 upon the rule effective date- July 21, 2021.¹

The facility is open Monday-Friday from 7am until 3pm.

FIELD ACTIVITIES SUMMARY

On May 25, 2023, Mr. Herbers, Ms. Kuc, Ms. Leeds, and I met at a designated area off site at 8:50 am and calibrated the Toxic Vapor Analyzer (TVA) and the Irwin devices until 9:40 am. We arrived at the facility at 9:55 am and we made entry at the visitor's entrance. Mrs. Olson greeted the four of us and I introduced myself and members of the inspection team, presented our credentials, and provided the reason for our inspection. Mrs. Olsen introduced us to Mr. Lallak and stated that the area supervisor, Mr. Nelson, would be with us shortly. Mr. Lallak showed us the most updated map of the landfill and explained some of the activities occurring on the landfill that day. I explained to Mr. Lallak that I would start the inspection by doing surface emission monitoring (SEM) with the TVA and that Ms. Leeds and Mr. Herbers would use the Irwin devices to confirm any hits and vice versa. I also explained that Ms. Kuc would use the Forward Looking Infrared (FLIR) camera to assess the origin of the leak if conditions allowed.

After a brief discussion about the landfill, Mr. Lallak informed us that we would need our hard hats and high visibility jackets for safety while on the landfill and we donned our personal protective equipment. We began SEM monitoring at 10:50 am. Mr. Herbers using the Irwin 92004350, Ms. Leeds using the Irwin 92004352, and I using the TVA, split up while Ms. Kuc followed me with the FLIR camera until the use of the FLIR was stopped (described below) and then Ms. Kuc took turns following me and Ms. Leeds and documenting methane values in an inspection notebook. Ms. Kuc followed me until usage of the FLIR stopped. She followed Ms. Leeds or me for the rest of SEM event. For each monitored exceedance, Ms. Leeds, Mr. Herbers or I labeled a flag with our first name initial and what number exceedance it was. I started the data logger on the TVA at 10:54 am, collecting data every 2 seconds. Ms. Kuc wrote in her inspection notebook the approximate location and methane value for 6 of the 7 methane

¹ EPA promulgated the Federal plan to implement the Emission Guidelines (EG) for existing MSW landfills located in states and Indian country where state plans or tribal plans are not in effect. Iowa does not have a State Plan for the EG.

exceedances the TVA found and all the exceedances from the Irwin 92004352. At the first TVA monitored methane exceedance marked by me with a flag designated A1, Ms. Kuc used the FLIR camera to evaluate the well area, but the wind was too strong to detect a point of origin for the leak so no FLIR camera information was documented in an inspection notebook. Mr. Nelson arrived on site around 11:30 am. Mr. Nelson told us that Sniffer Robotics personnel would join us while we were on the landfill. Around 11:40, use of the FLIR camera was terminated due to the wind. Four out of seven of the TVA monitored exceedances came from large ravines in the landfill or areas of distressed vegetation. **Table 4** contains the TVA values greater than 500 ppm and the locations from the TVA are shown in **Figure 1**. For four of the seven exceedances I found, Irwin devices were used to confirm the hits. Mr. Herbers used Irwin #92004350 to verify TVA exceedance flag A4 and Ms. Leeds used the Irwin #92004352 to verify TVA exceedance flag A3, A5, and A6. The first exceedance found on the TVA at A1, both Irwin devices did not measure above the 500ppm. No attempt was made to verify TVA exceedance flag A2 or A7 with either Irwin device. We concluded the first half of SEM at 1:02 p.m.

We took a brief lunch break from 1:02 pm until 2:00 pm. We performed bump tests to ensure the TVA and the Irwin devices were still calibrated and monitoring properly, and I noted the values for the Irwin devices and the TVA on the TVA calibration sheet located in the facility site folder. We continued to traverse the landfill and completed SEM at 4:19 pm, but I stopped the TVA data logger at 3:52 pm due to USB storage overload. **Appendix A** provides the ppm values recorded every 2 seconds using the TVA, the GPS locations, and the time the value was recorded. The figures below show the areas surveyed.

After putting our equipment away, we all went to the office. I began my records review at 4:26 pm. Listed below are the records I requested.

RECORDS REQUESTED ON SITE

- 1) Quarterly SEM reports from 2020 through 2023.
- 2) Daily fuel usage for the engines.
- 3) Annual report that includes fuel flow rate and heating values of each fuel to demonstrate heat value provided by landfill gas is 10% or more of total fuel consumption.
- 4) How the facility complies with subpart ZZZZ requirements for the generators.
- 5) Watered in well data.



Figure 1. Areas surveyed with the Toxic Vapor Analyzer with respective methane values over 500 parts per million (ppm)



Figure 2. Areas surveyed with the TVA with respective values under 500 ppm.

Once I concluded the records review, I conducted a closing conference with Mr. Nelson and Mr. Lallak. Mr. Nelson didn't claim anything as confidential (**Appendix B**) and he signed the Receipt

for Samples or Documents Received stating he saw the photos I took (**Appendix C**).² I did not leave a Notice of Preliminary Findings but did tell Mr. Nelson to treat the methane exceedances EPA found and flagged as an official SEM activity per the requirements listed in the regulation. Mr. Nelson and I exchanged emails on May 26, 2023, about the SEM and requirements of 40 CFR Part 62, Subpart OOO, **Appendix D**. Observations and potential findings from the facility tour, the records review, and sampling/measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

Measurement and/or Sampling Activities

The inspection team conducted field measurements via Method 21 as required by 40 CFR 62 Subpart OOO. **Table 4** summarizes field measurements that were above the 500-ppm threshold for methane logged by the TVA only. 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. The team followed manufacturer and EPA processes for instrument calibration. Instrument calibration was documented on the calibration sheet located in the site file folder. The Irwin device 92004350 methane exceedances and other information logged by the Irwin device values can be found in **Appendix E**. The TVA methane values can be found in **Appendix A**. A total of 24 exceedances were found.

Table 4 summarizes field measurement activities.

Table 4. FIELD MEASUREMENTS GREATER THAN 500 PPM				
Location Identifier (GPS)	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	PPM	Measurer Name
43.38379 -93.57300	5/25/23 11:02 am	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	2858	Avery Bowers
43.38263 -93.57420	5/25/23 11:19 am	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks	780	Avery Bowers
43.38184 -93.57208	5/25/23 11:54 am	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks	1686	Avery Bowers
43.38041 -93.57224	5/25/23 12:49 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks	1713	Avery Bowers

² Mr. Nelson was only shown photos taken by me. Mr. Herbers photos were taken using software on the Irwin ENTER #. Mr. Leeds took photographs, available in the photolog (Appendix C), but they were not shown to Mr. Nelson at the time of the inspection.

Table 4. FIELD MEASUREMENTS GREATER THAN 500 PPM				
Location Identifier (GPS)	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	PPM	Measurer Name
43.38041 -93.57224	5/25/23 12:53 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks	1318	Avery Bowers
43.38184 -93.57224	5/25/23 12:56 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks	1316	Avery Bowers
43.38348 -93.57626	5/25/23 2:36 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks	1616	Avery Bowers
43.383556 -93.570534	5/25/23 11:19 am	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks; Region 5 Procedure: Methane Leak Detector Equipment: IRwin SX Methane Leak Detector by Inficon serial number: 92004350	129,240	Jacob Herbers
43.382306 -93.570464	5/25/23 11:35	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	646	Jacob Herbers
43.382159 -93.570400	5/25/23 11:39 am	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	528	Jacob Herbers
43.381719 -93.570353	5/25/23 11:45 am	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	3,976	Jacob Herbers
43.381650 -93.570263	5/25/23 11:53 am	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	2305	Jacob Herbers
43.381299 -93.570553	5/25/23 12:01 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	700	Jacob Herbers
43.381034 -93.571486	5/25/23 12:24 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	1287	Jacob Herbers
43.380277 -93.571633	5/25/23 12:43 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	18550	Jacob Herbers
Trench	5/25/23 2:47pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	797	Jacob Herbers
43.384078 -93.576650	5/25/23 2:53 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	3625	Jacob Herbers
43.384072 -93.576670	5/25/23 3:04 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	115,722	Jacob Herbers
43.385066 -93.576226	5/25/23 3:16 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	4604	Jacob Herbers

Table 4. FIELD MEASUREMENTS GREATER THAN 500 PPM				
Location Identifier (GPS)	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	PPM	Measurer Name
43.385068 -93.575603	5/25/23 3:22 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	29,366	Jacob Herbers
43.385624 -93.575607	5/25/23 3:42 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	789	Jacob Herbers
43.385599 -93.575458	5/25/23 3:46 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	51,038	Jacob Herbers
43.385611 93.575284	5/25/23 3:49 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	1262	Jacob Herbers
43.385985 -93.574439	5/25/23 4:07 pm	Method: EPA Method 21: Determination of Volatile Organic Compound Leaks;	962	Jacob Herbers
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 activities were documented in field records. All photographs are attached as **Appendix C**. There was an accidental video taken by me (see data file No. 1 in **Appendix G**. Ms. Kuc took a video of methane bubbling on the surface of a leachate breakout (**Appendix G**). My team and I made the following observations during the inspection. My team and 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.

§ 62.16714 Standards for municipal solid waste landfill emissions

The facility is required to control the gas collected from within the landfill through the use of control devices meeting the requirements listed in 62.16714(c) or route the collected gas 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.

Although a 6th engine (unit EU62) was originally permitted and operational at the facility, it has since been removed and only 5 engines remain as part of the facilities gas to energy program.

The facility has a non-enclosed flare as a backup control device if the treatment system operated by Waste Management is not working. After reviewing the records for the flare's operation, it appears to be meeting the requirements since it is not the primary control device for the landfill. I did not ask the facility about the treatment system operated by Waste Management while I was on-site.

§ 62.16716 Operational standards for collection and control systems.

The facility is required to operate the gas collection system with negative pressure at each well per 62.16716(b). I reviewed the semiannual reports for the facility from 2020 through 2022 and the facility noted the wells that had positive pressures. In the semiannual reports for 2020 through 2022, the facility stated how long it took for each well to be corrected. The reports for 2020 and 2022 (not the 2021 reports) indicated that, if it could not achieve negative pressure within 15 days of the first exceedance, the facility conducted a root cause analysis in compliance with 40 CFR § 62.16720(a)(3)(i). The reports for 2020 and 2022 (not the 2021 reports) indicated that, if corrective action could not be implemented within 60 days of the initial exceedance, the facility conducted a corrective action analysis, and developed a implementation timeline to complete the corrective action within 120 days of the initial exceedance as required by 40 CFR 62.16720(a)(3)(ii).

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 62.16716(c). I reviewed the facility's semi-annual reports from 2020-2022 and there were no instances when the temperature exceeded the 131°F threshold.

The facility is required to monitor the oxygen levels at the wellheads per 40 CFR 62.16722(a)(2). I reviewed the semiannual reports for the facility from 2020-2022 and there were many occasions that the oxygen exceeded 5% but a record of every exceedance was kept per 62.16726(e)(2). The semi-annual reports indicated that the facility corrected the exceedances as well.

§ 62.16726 Recordkeeping guidelines.

The facility must keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report that triggered 62.16714(e), current amount of solid waste in-place, and the year-by-year waste acceptance rate 62.16726(a). I did not ask the facility for its waste acceptance records but prior to the inspection I reviewed the design capacity report that triggered 62.16714(e).

The facility is required to keep records of periods when the control system or control device is not operating 62.16726(c)(5). Semiannual reports for 2020 through 2021 stated that there were no periods when the back-up flare was nonoperational for a period exceeding 1 hour while the landfill gas was being routed to the flare. The 2022 semi-annual report showed that the treatment system operated by Waste Management was down for a total of 533 hours from and the back-up flare was down for a total of 3,819 hours from January 1, 2022 through June 30, 2022. The facility does not use the flare as the main control device for the landfill gas collected. The control devices were operated at all times when the collected landfill gas was routed to the specific device.

§ 62.16720 Compliance provisions.

In a July 13, 2023, email the facility sent to me, the facility stated that it took corrective action for the exceedances EPA found during its inspection on May 25, 2023 and completed the re-monitoring required for the locations per 40 CFR 62.16720(c)(1).

§ 63.1955 What requirements must I meet?

40 CFR § 63.1955 requires the facility to comply with startup, shutdown, malfunction (SSM) requirements of 40 CFR Part 63, Subpart A, General Provisions as specified in Table 1 to Subpart AAAA of this part and must demonstrate compliance with the operating conditions by parameter monitoring results that are within the specified ranges. 40 CFR§ 63.6(e)(1)(i) requires the owner or operator to operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction.

The facility submitted its 2021 and 2022 Annual compliance reports via email on July 13, 2023, stated there were no shutdowns or malfunctions during the reporting timeframe.

40 CFR § 63.6(e)(3) requires the owner or operator of an affected source to develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard.

On the day of the inspection, I did not ask to review the SSM Plan and I did not request it after the inspection. I found the SSM plan that and the facility submitted with its 2021 and 2022 annual compliance reports via email on July 13, 2023. I reviewed their SSM plan that was part

of each annual compliance report and each stated there were no shutdowns or malfunctions during the reporting timeframe.

§ 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

The facility owns and operates RICE engines that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis and is therefore not required to comply with Tables 1a, 2a, 2c, and 2d or the operating limitations in Tables 1b and 2b in 40 CFR Part 63, Subpart ZZZZ, per 40 CFR 63.6600(c).

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

The facility must monitor and record the fuel usage daily with separate fuel meters to measure the volumetric flow rate of each fuel. The only fuel used in the engines is the landfill gas. The facility submitted its daily fuel usage records on July 13, 2023, via email and they appear to be compliant.

The facility is required to operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions per 40 CFR 63.6625(e). I did not ask the facility about its maintenance plan for the engines or ask for the manufacturer's instructions while I was on site.

§ 63.6650 What reports must I submit and when?

The facility is required to submit an annual compliance report. Mr. Nelson submitted annual reports for 2021 and 2022, via email on July 13, 2023. The reports state the total landfill gas consumed by the engines, the heating value, and demonstrate that the percentage of heat input provided by landfill gas or digester gas, was equivalent to 10 percent or more of the gross heat input on an annual basis.

Potential Finding 1: If negative pressure cannot be achieved within 15 calendar days of the first measurement of positive pressure, the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but not later than 60 days after positive pressure was first measured. The owner or operator must keep records.

Observation Summary: The facility did not provide root cause analysis for the 2021 positive pressure readings, the facility did provide documentation that it conducted a corrective action analysis or develop an implementation schedule for corrective actions not fully

Potential Finding 1: If negative pressure cannot be achieved within 15 calendar days of the first measurement of positive pressure, the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but not later than 60 days after positive pressure was first measured. The owner or operator must keep records.
implemented within 60 days following the positive pressure readings, and the facility did submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator for corrective actions expected to take longer than 120 days after the initial exceedance.
Citation: <i>40 CFR 62.16720(a)(3)(i), 40 CFR 62.16720(a)(3)(ii), 40 CFR 62.16720(a)(3)(iii), and § 62.16726(e)(3)</i>
Evidence: 2021 semiannual compliance reports
Description of Observation: The semi-annual compliance reports covering January 1, 2020, through December 31, 2020, submitted in 2021 showed many pressure exceedances and the timeframe in which they were corrected but no root cause analysis was reported as being conducted. The timeframe to correct was the positive pressure readings was between 61 and 155 days for four wells.

End of report.