



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

Air Branch

**Air Branch Inspection Report
Announced Full Compliance Evaluation
Butler County Sanitary Landfill**
6038 Highway T
Poplar Bluff, MO 63901
FRS# 110010427564

Mailing address :
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Inspection Date(s):
June 22, 2022

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A June 19, 2014, letter (88 pages)
B Passive venting system pilot program (16 pages)
C 1 st Sampling Event (27 pages)
D 2 nd Sampling Event (35 pages)
E 3 rd Sampling Event (35 pages)
F Request for Final Closure approval documents (25 pages)
G Photo log and photos (32 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 objectives of the full compliance evaluation (FCE) inspection were to evaluate the vegetation on the final cover and to examine the transition from the active utility flare to the passive venting system in the facility's approved pilot program. This helps determine the compliance of the facility with the Clean Air Act section 111 New Source Performance Standards (NSPS) regulations as part of the Creating Cleaner Air for Communities National Compliance Initiative (CCAC- NCI). This report documents EPA's activities on site.

I was the only inspector at this inspection.

FACILITY CONTACT INFORMATION

Table 1 lists the primary facility contacts.

Table 1. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Brady Barber, Environmental Technician	(314) 683-3919	bbarber@republicservices.com
Dave Vasbinder, Environmental Manager	(314) 249-9404	dvasbinder@republicservices.com

FACILITY OVERVIEW

Butler County Sanitary Landfill (Butler County Landfill) has a Standard Industrial Classification (SIC) code 4953 categorized as refuse system 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 on-site compliance monitoring activities include an FCE on January 14, 2021, an FCE on November 6, 2014, and an FCE on August 28, 2014, all conducted by the Missouri Department of Natural Resources (MoDNR). Butler County Landfill's permits were issued by MoDNR, but after its closure (discussed below) it is only subject to the following regulations and standards listed in Table 2.

Table 2. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Regulation/Standard Name
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

Table 2. APPLICABLE REGULATIONS AND STANDARDS	
40 CFR Part 61	Subpart M, National Emission Standards for Asbestos
40 CFR Part 258	Subpart F, Closure and Post Closure Care ¹
Code of State Regulations	Regulation/Standard Name
C.S. R.	10 CSR 80-3.010- Solid Waste Disposal Areas- Sanitary, Demolition and Special Waste Landfills. ²
C.S.R.	10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
¹ This is a Solid Waste program regulation not an Air Program regulation in the CFR. ² Specifically, the facility is subject to State's Solid Waste Management regulation at 10 CSR 80-3.010(17)(C)8. which requires the final cover at the landfill to be constructed and installed in accordance with the landfill's approved closure/post-closure plan.	

FACILITY OPERATIONS SUMMARY

Butler County Sanitary Landfill (Butler County Landfill) was issued its first operating permit in 1980 and it began accepting waste in that same year under the parent company of Allied Waste Industries, Inc. In 1993, the landfill underwent either a construction, modification, or reconstruction, making the landfill subject to regulations in the code of federal regulations (CFR) at 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. In 2001, after Tier 2 non-methane organic compounds (NMOC) emission rate testing resulted in 81 Mg/year, Butler County Landfill submitted a design for the gas collection control system (GCCS) plan as required by Subpart WWW, specifically 40 CFR 60.752(b)(2). The GCCS plan was approved in 2003 and development of the system began in April 2004. In late 2008, Republic Services acquired the landfill from Allied Waste but there was another landfill roughly 20 miles away in Dexter, MO, and in 2010 Butler County Landfill closed since the market could not afford to have both landfills operating. On March 31, 2010, the landfill ceased accepting waste resulting in the landfill becoming a closed landfill. A letter dated June 19, 2014, from the Missouri Air Pollution Control Program confirms NSPS Subpart WWW 60.752(b)- 60.759 requirements were no longer applicable. **Appendix A** shows the letter correspondence along with a detailed reasoning for why the landfill closure in 2010 changed the standards for air emissions of Subpart WWW to the landfill.

FIELD ACTIVITIES SUMMARY

On June 21, 2022, I sent an email to Mr. Vasbinder and called the regional office of which he worked to inform him of the inspection I was going to conduct. He responded to my phone call and ensured that one of his representatives would be there to allow me access to the landfill which was typically locked. He stated I could reach him via phone or email for any questions his subordinate could not answer. We arranged for the inspection to be on June 22, 2022. Via email, Mr. Vasbinder sent me the documentation for the pilot program and its approval (**Appendix B**), the sampling events necessary to close the landfill (**Appendix C, D, E**), and the request for final closure approval documents needed for the landfill (**Appendix F**). The following day Mr. Barber and I met at a designated area at 10:29 a.m. and he led the way to the inspection site. After unlocking the gate, we entered the facility at 10:48 a.m.

Once we entered the facility, I introduced myself, presented my credentials, and provided my business card to Mr. Barber. Mr. Barber notified me of the safety precautions necessary and I followed the directions for use of steel toed boots and insect spray. 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 conditions listed in Table 2. I explained that I would observe and take photos of the landfill. I explained to Mr. Barber that the facility could make a claim of business confidentiality and I would provide the sheet for him or Mr. Vasbinder to sign electronically. Upon completion of the conference Mr. Barber and I toured the landfill, (**Appendix G**) from 11:01 am until 11:39 am.

I conducted a brief closing conference with Mr. Barber and let him know I would direct all further inquiries to Mr. Vasbinder as requested by Mr. Vasbinder.

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

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix G**. 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.

While observing the landfill, I noticed the vegetation on the final cover was in good condition. I also saw the integration of the passive venting system was being operated, monitored, and maintained according to the program's implementation plan.

No potential findings were witnessed during the inspection but the EPA will continue to review all the documents the facility submitted to ensure compliance.