



**REGION 5**

CHICAGO, IL 60604

**VIA ELECTRONIC MAIL**  
**DELIVERY RECEIPT REQUESTED**

Curt Publow  
Environmental Compliance Manager  
South Side Landfill, Inc.  
2561 Kentucky Avenue  
Indianapolis, Indiana 46221

[cpublow@ssidelandfill.com](mailto:cpublow@ssidelandfill.com)

Re: Information Request under Section 114 of the Clean Air Act  
South Side Landfill, Inc.  
Indianapolis, Indiana

Dear Curt Publow:

Pursuant to Section 114(a) of the Clean Air Act ("CAA"), 42 U.S.C. § 7414(a), the U.S. Environmental Protection Agency is requiring South Side Landfill, Inc. ("South Side" or "you") to submit information about its landfill at 2561 Kentucky Avenue, Indianapolis, Indiana. South Side owns and operates an emission source at the Indianapolis, Indiana facility.

This information is needed to determine whether the South Side facility is in compliance with the requirements of the CAA and its implementing regulations. Section 114(a) authorizes the Administrator of the EPA to require any person who owns and operates an emission source, whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the

CAA. This authority has been duly delegated to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. **South Side must send this information to us within 60 calendar days after you receive this request.**

We ask South Side to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Sasa Dunovic at [dunovic.sasa@epa.gov](mailto:dunovic.sasa@epa.gov) or (312) 353-8723 or Brianna Fenzl at [fenzl.brianna@epa.gov](mailto:fenzl.brianna@epa.gov) or (312) 886-1960 to make arrangements to submit South Side's response.

South Side must submit all required information accompanied by the following certification, signed and dated by a responsible official of South Side:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

South Side may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information South Side submits to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If South Side does not assert a business

confidentiality claim when submitting the information, the EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.


Failure to comply fully with this information request may subject South Side to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sasa Dunovic at [dunovic.sasa@epa.gov](mailto:dunovic.sasa@epa.gov) or (312) 353-8723 or Brianna Fenzl at [fenzl.brianna@epa.gov](mailto:fenzl.brianna@epa.gov) or (312) 886-1960.

Sincerely,

**MICHAEL  
HARRIS**

Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division

 Digitally signed by MICHAEL  
HARRIS  
Date: 2024.09.19 11:04:58  
-05'00'

cc: Janusz Johnson, Chief  
Air Compliance Branch  
Office of Air Quality  
Indiana Department of Environmental Management  
[jjohnson@idem.IN.gov](mailto:jjohnson@idem.IN.gov)

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify the EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for the EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide submission to the secure web-link provided by the EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.* or the Indiana State Implementation Plan (SIP); the 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 at 40 CFR Part 60 Subpart WWW; the 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 at 40 CFR Part 62 Subpart OOO; the Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2024 at 40 C.F.R. Part 60, Subpart XXX; or the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills at 40 C.F.R. Part 63, Subpart AAAA.

1. *Abandoned* means, when used in reference to a component of the gas collection system, a component that has been cut off at or below the surface, capped, and backfilled.
2. *Document* and the plural form thereof means all written, recorded or graphic matters, however produced or reproduced, of every kind and description, pertaining in any way to the subject matter of this action. The term "Document" shall include, but are not limited to: any receipts; invoices; shipping records; purchase orders; purchase records; books; pamphlets; periodicals; memoranda (including those of telephone or oral conversations); contracts; correspondence; agreements; applications; financial records; security instruments; disbursements; checks; bank statements; time records; accounting

or financial records; notes; diaries; logs; facsimiles (faxes); telegrams or cables prepared, drafted, received or sent; electronic mail (emails), whether drafted, received, or sent; tapes; transcripts; recordings; minutes and notes of meetings; directives; work papers; charts; drawings; prints; flow sheets; photographs; infrared camera recordings; film; computer printouts; x-ray photographs; advertisements; catalogs; data; sampling reports, plans, protocols, reports, analyses; or any handwritten, recorded, transcribed punched, taped, filmed, or graphic matter, however produced or reproduced, in Your possession, custody, or control or to which You have or have had access.

3. *Facility or Facilities* means all operations located at 2561 Kentucky Ave, Indianapolis, Indiana 46221, respectively, and associated adjacent or nearby operations owned or operated by South Side Landfill, Inc.
4. *Gas Collectors* means vertical wells, horizontal collectors, or other collection devices capable of collecting and extracting gas at the landfill and meets the requirements of 40 C.F.R § 63.1962 and parallel provisions under the other EPA Landfill Air Regulations.
5. *Gas collection system* means an active or passive system of wells or similar collection components used to collect and move gas at the landfill.
6. *Gas Collection and Control System or GCCS* means an active or passive system of wells or similar collection components to move gas at the landfills to associated control devices per the requirements at 40 C.F.R. § 63.1959(b)(ii) and parallel provisions under the other EPA Landfill Air Regulations.
7. *Gas Collection and Control System Design Plan, or Design Plan*, means a plan that is developed by the landfill and meets the requirements of 40 C.F.R. § 63.1981(d) and parallel provisions under the other EPA Landfill Air Regulations.
8. *Gas Control System* means the systems that treat and/or destroy landfill gases collected by the gas collection system, including but not limited to flares, gas to energy projects, and renewable natural gas plants, as well as any other control devices and treatment systems used to fulfill the control requirements of 40 C.F.R. § 63.1959(b)(2)(iii) and parallel provisions under the other EPA Landfill Air Regulations.
9. *Gas mover equipment* means the equipment (*i.e.*, fan, blower, compressor) used to transport landfill gas through the header system.
10. *Inactive collector* means a gas collection device that is no longer collecting gas, whether temporarily or permanently.
11. *Landfill* means the municipal solid waste (MSW) landfill operated by South Side Landfill, Inc.

12. *Landfill Air Regulations* refers to 40 C.F.R. Part 60, Subpart WWW; 40 C.F.R. Part 60, Subpart XXX; 40 C.F.R. Part 62, Subpart OOO; 40 C.F.R. Part 62, Subpart GGG; 40 C.F.R. Part 63, Subpart AAAA; and State Plans for the Control of Emissions from Existing Municipal Solid Waste Landfills incorporated under 40 C.F.R. Part 62 pursuant to 40 C.F.R. Part 60, Subpart Cf or Cc, as applicable.
13. *LandGEM* means EPA's Landfill Gas Emissions Model, which is an automated estimation tool with a Microsoft Excel interface that can be used to estimate emissions for total landfill gas, methane, carbon dioxide, nonmethane organic compounds, and individual air pollutants from municipal solid waste landfills.
14. *Leachate* means liquids, including landfill gas condensate inside the landfill.
15. *Owner or Operator* means any Person who owns, leases, operates, controls, or supervises the Facility.
16. *Person* or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country), or any other entity, and includes South Side Landfill, Inc.
17. *Radius of influence* means the distance from the well center to a point in the landfill where the pressure gradient applied by the gas mover equipment approaches zero.
18. *Renewable natural gas (RNG) processing facility* means Indy High BTU, LLC, located at 2319 Kentucky Avenue, Indianapolis Indiana.
19. *State* means a State, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, and American Samoa and includes the Commonwealth of the Northern Mariana Islands. 42 U.S.C. § 7602(d).
20. *Surface Emission Monitoring* or "*SEM*" means monitoring surface concentrations of methane at collection areas of a landfill, as required by 40 C.F.R. §§ 63.1960(c)&(d) and parallel provisions under the other EPA Landfill Air Regulations.
21. *You* and/or *Your* means South Side Landfill, Inc. and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive) of relevant information that is otherwise available to You or may have obtained information for or on Your behalf.



## **Appendix B**

### **Information You Are Required to Submit to the EPA**

South Side Landfill, Inc. must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). For each numbered request, please indicate the individual(s) who were responsible for answering and provide their title and email address.

#### **General Applicability**

1. Provide all dates on which the Landfill commenced construction, reconstruction, and/or modification, as defined by 40 C.F.R. §§ 63.2, 63.1990, and parallel provisions under EPA's Landfill Air Regulations.
2. If the Landfill opted-in early to 40 C.F.R. Part 63, Subpart AAAA, provide the date that the Landfill opted-in to Subpart AAAA.
3. Identify on what dates, since 1990, the Landfill became subject to or opted-in to the following Federal programs, in part or in whole:
  - a. 40 C.F.R. Part 60, Subpart WWW;
  - b. 40 C.F.R. Part 60, Subpart XXX;
  - c. 40 C.F.R. Part 62, Subpart OOO;
  - d. A State Plan implementing 40 C.F.R. Part 60 Subpart Cf; and/or
  - e. 40 C.F.R. Part 63, Subpart AAAA.
4. Following your response to Request #1, provide copies of the relevant initial design capacity reports.

#### **Corporate Structure and Agreements**

5. Provide agreements between South Side Landfill, Inc., Indy High BTU, or other business entity pertaining to the following shared or separate responsibilities:
  - a. Operation of the gas collection system on the Landfill;
  - b. Gas routing and operation of controls for gas collected from the Landfill;
  - c. Clean Air Act reporting, monitoring, or compliance requirements at the Landfill, including for treatment systems, pursuant to 40 C.F.R. § 63.1959(c) and (d) and parallel provisions under EPA's Landfill Air Regulations.
  - d. Waste and other operations at the Landfill.
6. Identify each person having an ownership interest in the property, the landfill, and the GCCS equipment.



7. Describe the current business structure of South Side Landfill, Inc. and its affiliated organization's entities under common ownership, and respective ownership interests in each entity. If available, provide an organizational chart depicting the parent and subsidiary companies affiliated with South Side Landfill, Inc.
8. For each Permit and Design Plan, describe the approval process within the Facility. If approval for obtaining such Permits or Design Plans is also required from the Facility's parent company or companies, describe the approval process within the parent company's corporate structure, including the chain of the requisite approvals for this decision-making process, the individuals who were involved in the decision-making process, the employer and title of each individual involved, and the ultimate decision maker and/or entity within the corporate structure that provided final approval. To the extent individuals involved had more than one title or employer, provide each title and employer.

#### **Permits and Applications/Alternatives/Variations/Previous Enforcement**

9. Provide copies of the following documents for the Facility:
  - a. All permit(s) in effect as of the date of this Request and the permit application(s) you submitted to obtain each such permit;
  - b. Permit application(s) pending as of the date you received this Request;
  - c. The original construction permit(s) and permit application(s). If an original construction permit has been modified, provide the current version of the construction permit; and
  - d. Title V permit compliance certifications and deviation reports between January 1, 2020, and the date of this request.
10. Provide a copy of the following:
  - a. All applicability determination or regulatory interpretation requests to and responses from the IDEM or EPA;
  - b. All approvals of alternatives to Landfill Air Regulation requirements issued by IDEM or EPA; and
  - c. Alternative compliance timeline requests to and responses from the IDEM or EPA.
11. Provide copies of Clean Air Act regulatory enforcement documents issued by IDEM or EPA, including but not limited to citations, notices of violation, consent orders, consent decrees, and decrees or orders terminating any of the foregoing documents issued to the South Side Landfill, Inc. regarding Clean Air Act compliance at the Facility, dated between January 1, 2015, to the date of this request.
12. Provide copies of citizen suit complaints filed with a judicial court and resulting agreements related to Clean Air Act compliance at the Facility.

13. In an unlocked, Excel-compatible spreadsheet, provide information regarding citizen complaints that the Landfill has knowledge of between January 1, 2020, and the date of this request. Include underlying documentation or statements from which you compiled the information in the spreadsheet. The spreadsheet should include:
- a. Date and time;
  - b. Location at or near the Landfill which is the subject of the complaint;
  - c. Description of complaint;
  - d. Corrective action or monitoring done as a result; and
  - e. Name and contact information for the person who submitted the complaint.

#### **Semi-annual/Annual Reports**

14. Provide all semi-annual and annual reports between January 1, 2020 and the date of this request.

#### **Waste Type and Quantity Data**

15. In an unlocked, Excel-compatible electronic spreadsheet format, provide the monthly quantity (short tons or megagrams, labeled) of waste accepted at the Landfill, and any underlying documentation or statements from which this information is compiled, between January 1, 2020, and the date of this request, including:
- a. A breakdown by type of waste (e.g., municipal solid waste, construction and demolition, asbestos, sludge, etc.);
  - b. Specify segregated Landfill location(s) or cell(s) in which each type of waste was placed;
  - c. List the types and quantities of waste that are excluded from the maximum expected gas generation calculation and the rationale for excluding those types of waste.
  - d. List the types and quantities of waste that are classified as “inert” in facility reports for Greenhouse Gas Reporting Program pursuant to 40 C.F.R. § 98.346(c).
16. Provide the current topographic site map(s) displaying the following information:
- a. Cell and phase identifiers, including, but not limited to, the dates that each cell and phase started and stopped accepting waste;
  - b. Areas under daily cover, intermediate cover, final grade not under final cover, and areas at final grade under final cover;
  - c. Segregated areas for special types of waste and nondegradable waste; and
  - d. Leachate collector locations and identifiers, including leachate and leachate header lines.

## **NMOC Reports and Testing**

17. Provide a copy of non-methane organic compounds (NMOC) emission rate reports and other calculations, including reports for Tier 2, 3, or 4 tests, that have been submitted to the State or EPA between January 1, 2017 and the date of this request, as applicable.
18. In providing NMOC emission rate reports, list the types of waste that are classified as “nondegradable waste” if nondegradable wastes are excluded from any NMOC calculations.
19. If NMOC emission rate calculations relied upon a determination of a site-specific NMOC concentration, provide all underlying documentation for that determination.

## **Gas Collection and Control System (GCCS) Design**

20. Provide a copy of the following documents related to the Design Plan as required under 40 C.F.R. § 63.1981 and parallel provisions under EPA Landfill Air Regulations:
  - a. Design Plans for the GCCS operated at the Landfill since January 1, 2015.
  - b. Copies of EPA or IDEM approval, disapproval, or other response to the two most recent Design Plans. If EPA or IDEM did not provide an approval, disapproval, or other response, provide a statement that EPA or IDEM did not approve, disapprove, or otherwise respond to Landfill’s submission of the Design Plan(s).
  - c. An explanation for areas excluded from gas collection;
  - d. A description of the design of the main gas header, including:
    - i. Diameter size;
    - ii. Maximum rated flow rate capacity;
    - iii. Maximum operating flow rate; and
    - iv. Maximum allowable pressure drop.
  - e. As-built, final design documents for each flare/blower system. The design documents shall include but not be limited to the following (for each piece of equipment):
    - i. The manufacturers’ expected/design life (years);
    - ii. Minimum and maximum design flare temperatures (°F);
    - iii. Maximum exit velocity allowed by a CAA permit;
    - iv. The rated maximum flow rate capacity of the flare (standard cubic feet per minute, scfm); and
    - v. The blower(s) and backup blower(s) rated maximum flow rate at inlet vacuum and discharge pressure.
  - f. Most recent maximum expected gas flow rate calculations, if not from the Design Plan.
    - i. Include the annual or monthly waste breakdown for every year used in the maximum expected gas flow rate calculations.
    - ii. If LandGEM is used, provide the unlocked, Excel-compatible electronic spreadsheet containing the most recent LandGEM calculation.

- iii. If LandGEM is not used, provide the most recent maximum expected gas flow rate calculations.
- iv. Include scale house data of waste excluded from LandGEM calculations.

### **Gas Collection System**

21. Provide the following information for the gas collection system:

- a. List of existing and historical gas collectors and leachate collectors, which are or were connected to the gas collection and control system;
- b. Date of installation of each existing and historical gas well or leachate collector. For each redrilled well, explain why the well was redrilled.
- c. For each existing or historical well or leachate collector that is not in active service collecting landfill gas as of the date of this Request, provide the date on which the well or collector was taken out of active service and describe the status of the well/collector, including whether the valve is open or closed, whether the well/collector is connected to the GCCS, whether the header lateral has been capped, and whether the well has been abandoned as defined in Appendix A of this Request. Provide justification for deactivation of the well and approvals as applicable.
- d. Indicate whether a gas well is a vertical or horizontal well;
- e. Indicate the location of each well, both by cell and phase identifier and by GPS coordinates;
- f. Indicate whether each existing gas well has a pump for leachate/water removal;
- g. Indicate higher operating value or alternative operating procedure for gas wells;
- h. Installation dates for collectors installed between January 1, 2015 and the date of this request; and
- i. Evaluations or analyses, conducted either by you or an external consultant/company, of the gas collection network, including any evaluation or analysis related to:
  - i. Well placement;
  - ii. Well depth;
  - iii. Well density;
  - iv. Amount of vacuum applied; and
  - v. Estimated radius of influence.

22. Provide the current topographic site map(s) displaying the following information:

- a. Gas well locations and identifiers, including gas laterals and gas headers;
- b. A schematic depicting each landfill gas collection well and its current, estimated radius of influence;
- c. Areas in which waste has been in place for 5 years or more if active (or 2 years or more if closed or at final grade); and
- d. Areas in which gas collection is not occurring.

### Wellhead Monitoring Data

23. In an unlocked, Excel-compatible electronic spreadsheet format, provide GCCS monitoring records, including dates, times, and descriptions of all monitoring activity, as well as corrective actions taken as a result of monitoring at the Facility, between January 1, 2020 and the date of this request. Provide underlying documentation or statements from which you compiled the information in the spreadsheet. Please include the following:
- a. Monthly GCCS wellhead measurements, including:
    - i. Methane;
    - ii. Hydrogen;
    - iii. Carbon monoxide (CO);
    - iv. Flow rate;
    - v. Oxygen;
    - vi. Nitrogen;
    - vii. Pressure;
    - viii. Temperature; and
    - ix. Notes taken by the technician during monitoring, corrective actions, and re-monitoring measurements.
  - b. Monitoring data for each blower, including vacuum;
  - c. Available vacuum and oxygen measurements collected at the lateral headers, landfill gas transmission piping, and isolated segments of the GCCS;
  - d. Gas well parameter exceedances and corrective actions, including enhanced monitoring due to elevated temperatures, and corrective actions;
  - e. Wellhead higher operating values approvals relevant from January 1, 2020 and the date of this request, along with approvals of alternative timelines or corrections in that time; and
  - f. A list of gas wells not monitored during monthly monitoring and the explanation for exclusion.

### Depth-to-Water and Depth of Perforation Data

24. In an unlocked, Excel-compatible spreadsheet(s), provide the following information related to each vertical gas well available, and any underlying documentation or statements from which this information is compiled, between January 1, 2020 and the date of this request:
- a. Records of measurements of depth to water and/or height of water taken between January 1, 2020 and the date of this Request;
  - b. Documentation of pinches and other obstructions;
  - c. Depth to bottom of the well;
  - d. Length of perforated pipe;
  - e. Percentage of perforation; and
  - f. A description of corrective actions taken by the facility as a result of the water level measurements or observation of obstructions, as applicable; and
  - g. Narrative response on the Landfill's work practice for monitoring water-levels.

### GCCS Main Header Data

25. In an unlocked, Excel-compatible spreadsheet, provide the following data for the landfill gas collection system main header on an hourly basis, and any underlying documentation or statements from which this information is compiled, from January 1, 2020 and the date of this request:
- a. Date and hour;
  - b. Average system pressure (inches of water column, in. w.c.);
  - c. Average gas flow rate collected (standard cubic feet per minute, scfm);
  - d. Average landfill gas temperature (degree Fahrenheit, °F); and
  - e. Average methane concentration.
26. Provide gas sampling reports between January 1, 2020 and the date of this request including, but not limited to:
- a. Sampling done for methane concentration;
  - b. Sulfur compounds; and
  - c. Hazardous air pollutant (HAP) content.

### **Gas Control System**

27. Provide a description of the as-built gas control system, including each piece of equipment that is part of the system, such as flares, associated blowers, and back-up controls. Where applicable, your description must reference previously submitted reports to the Agency. Include the following information in your description:
- a. The make and model of each piece of equipment that is part of the gas control system;
  - b. The date of manufacture and installation;
  - c. Design specifications including, but not be limited to the following:
    - i. The manufacturers' expected/design life (years);
    - ii. The minimum and maximum, if applicable, design temperatures (degree Fahrenheit, °F);
    - iii. The maximum rated operating capacity (e.g., British thermal units, per hour, Btu/hr.);
    - iv. The minimum and maximum, if applicable, rated gas flow rate to the device (standard cubic feet per minute, scfm);
    - v. The maximum exit velocity permitted or recommended by the manufacturer;
    - vi. The maximum blower inlet vacuum and discharge pressure (standard cubic feet per minute, scfm, and inches of water column, in. w.c., or equivalents);
    - vii. The system shutdown set points for velocity and temperature during normal and emergency operations; and
    - viii. The equipment operating parameters and limits;
  - d. A description of each emergency shut down procedures after detection of a malfunction; and
  - e. The user manual and manufacturer's recommendations for each system.

28. Provide monthly inspection, maintenance, and repair logs and records for each piece of control equipment (e.g., blower/flare system) between January 1, 2020 and the date of this request.
29. In an unlocked, Excel-compatible spreadsheet, provide monitoring data described below for each control device, excluding flares, and including underlying documentation or statements from which you compiled the information in the spreadsheet. Provided data collected between January 1, 2020 and the date of this request. The requested monitoring data should include gas filtration and treatment:
- Temperature or heat sensing data;
  - Gas flow rate. The flow rate should be represented as total gas flow rate. Where a gas plant has more than one control device or bypass, provide individual flow rates and the gas flow to each pilot flame;
  - Continuous sulfur monitoring data, if available;
  - Operating hours on a monthly basis for each control device;
  - Records of bypass incidents at each control device;
  - Carbon media changeout frequency and records, if available; and
  - Monthly emissions (tons/month) with supporting calculations, for:
    - Volatile organic compounds;
    - Nitrogen oxides;
    - CO; and
    - Sulfur dioxide (SO<sub>2</sub>).
30. In an unlocked, Excel-compatible spreadsheet, provide the following monitoring data for each flare, and underlying documentation or statements from which you compiled the information in the spreadsheet, between January 1, 2020 and the date of this request:
- Temperature readings;
  - Gas flow readings;
  - Methane percentages at each flare;
  - Operating hours on a monthly basis for each flare;
  - Records of bypass incidents at each flare; and
  - Monthly SO<sub>2</sub> emissions calculations (tons/month, tons/year) for each flare system with supporting calculations.
31. Provide the initial and subsequent performance test report(s) for the gas collection and gas control system (e.g., enclosed combustors, candlestick flares, engines), including but not limited to those performed to demonstrate compliance with 40 C.F.R. §§ 63.1959(b)(2)(iii) and 63.1981(i) and parallel provisions under EPA Landfill Air Regulations, and reports for additional performance or stack tests conducted for any purpose (including compliance testing, engineering testing, and testing for general information) between January 1, 2020 and the date of this Request.



## Renewable Natural Gas Plant

32. Provide the following information for major pieces of processing or control equipment at the renewable natural gas (RNG) processing facility:

- a. A process flow diagram, which indicates emission points;
- b. A process flow diagram of the landfill gas treatment systems (including sulfur treatment systems and renewable natural gas treatment).
- c. The make, model, date of construction, and date of installation of major pieces of processing or control equipment at the RNG processing facility;
- d. As-built, final design documents for the RNG processing facility's control equipment, including (if applicable) but not limited to:
  - i. The manufacturers' expected/design life (years);
  - ii. Minimum and maximum operating temperatures (°F);
  - iii. The maximum exit velocity rated or recommended by the manufacturer;
  - iv. The rated minimum and maximum flow rate capacities for blowers (scfm).
- e. A description of the emergency shutdown procedures after detection of a malfunction at the RNG processing facility;
- f. System shutdown set points for velocity and temperature; and
- g. Detail information related to blower(s) and backup blowers(s) installed. Specifically, provide the following:
  - i. Date of manufacture and date of installation of the blower(s) and backup blower(s);
  - ii. Design documents describing the blower(s) and backup blower(s), including but not limited to rated maximum flow rate at inlet vacuum and discharge pressure;

33. Provide the following documents for RNG processing facility between January 1, 2020, and the date of this Request:

- a. Standard Operating Procedure (SOP), maintenance records, and design specification for flare(s) operated by RNG processing facility;
- b. SOP, maintenance records, and design specification for thermal oxidizer (TOX) operated by RNG processing facility;
- c. Records of landfill gas flow entering RNG processing facility (pretreatment);
- d. Records of gas outflow into pipeline (post treatment);
- e. Records of vacuum on landfill gas entering the RNG processing facility;
- f. All reports documenting any deviations from permit requirements;

34. In an unlocked, Excel-compatible spreadsheet, provide emissions calculations, between January 1, 2020 and the date of this Request, including but not limited to:

- a. Emission factors used for calculating the emissions and the maximum hourly emissions of the TOX and the flare(s), with supporting documentation;
- b. The amount of waste gas sent to the TOX (mmscf/month and mmscf/year);
- c. The amount of off-spec gas sent to the flare (mmscf/month and mmscf/year); and

- d. Emissions of carbon monoxide (CO), nitrogen oxides (NOX), particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), volatile organic matter (VOM), and hazardous air pollutants (HAPs) (tons/month and tons/year).
35. Provide a list of all emissions tests conducted for any reason and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the guidelines below for compiling the list and preparing copies of the stack test reports.
- a. **List:** Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), and the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with IDEM.
  - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
36. For the hydrogen sulfide removal process at RNG processing facility, provide:
- a. Design specifications;
  - b. SOP, maintenance records, and design specification;
  - c. Manufacturers recommendations; and
  - d. Records addressing use of good operating practices.
37. In an unlocked, Excel-compatible spreadsheet, provide all monitoring records related to the flare(s) operated by RNG processing facility between January 1, 2020 and the date of this Request:
- a. Flare capacity;
  - b. Gas flow readings;
  - c. Presence of flame;
  - d. Waste and or off-spec gas throughput;
  - e. Any period when the flare was taken out of service due to a malfunction with a description of the cause of the malfunction, the length of time it was taken out of service, and an explanation of actions taken to prevent or reduce the likelihood of future occurrences; and
  - f. Any period of bypass usage.
38. In an unlocked, Excel-compatible spreadsheet, provide all monitoring records related to the thermal oxidizer operated by RNG processing facility between January 1, 2020 and the date of this Request:
- a. Flow capacity;
  - b. Gas flow readings;
  - c. Temperature set point;

- d. Latest performance test;
- e. Temperature readings;
- f. Waste and/or off-spec throughput;
- g. Any period when the thermal oxidizer was taken out of service due to a malfunction with a description of the cause of the malfunction, the length of time it was taken out of service, and an explanation of actions taken to prevent or reduce the likelihood of future occurrences; and
- h. Any period of bypass usage.

### **Surface Emissions Monitoring (SEM)**

39. In an unlocked, Excel-compatible spreadsheet, where applicable, provide SEM records since January 1, 2020. Please make sure units of measurement are clearly indicated and include underlying documentation or statements from which you compiled the information in the spreadsheet. For each monitoring event, include:
- a. Date(s) and description(s) of the monitoring activity, including identification of the device used;
  - b. SEM data, including but not limited to instrument calibration data, methane concentration at the location of each monitored exceedance marked according to 40 C.F.R. § 63.1960(c)(4)(i), any other recorded methane concentrations, raw instrument data outputs, methane concentration upon re-monitoring at the location of each monitored exceedance;
  - c. Records or descriptions (if the facility does not maintain records) of corrective actions performed in response to each monitored exceedance;
  - d. GPS coordinates, notes, drawings, or other records of the actual path traversed by the SEM technician for each quarterly SEM event;
40. Maps, for each quarterly SEM event since January 1, 2020, depicting:
- a. The monitoring route traveled and any deviations from the 30-meter intervals; and
  - b. areas excluded from surface emission monitoring (SEM) or exempt from quarterly SEM, including explanation(s) for each area excluded or exempted.
41. Records or reports of additional emissions monitoring activities conducted at the direction of the Facility, including but not limited to drone, satellite, and tower-based monitoring, between January 1, 2020, and the date of this request.
42. All training, instructional, or procedural materials provided to the SEM technicians, including contractors.

EPA June 2024 Inspection follow-up

43. Provide the Landfill's post-EPA inspection SEM follow-up information, including each of the monitored exceedance locations identified by EPA during the inspection, provide the SEM concentrations recorded during each re-monitoring event and the corrective action(s) completed or planned at each location.

Cover Integrity

44. Describe the cover integrity program you used to comply with 40 C.F.R. §§ 60.755(c)(5), 62.16720(c)(5), and 63.1960(c)(5), between January 1, 2020 and the date of this Request and provide procedures, maps, or other documents you use to implement the cover integrity program.
45. For the period of January 1, 2020, through the date of this Request, provide monthly cover integrity reports, including descriptions of corrective actions and corrective action start and completion dates.
46. Provide a list of alternative covers approved for use at the Landfill and indicate time periods in which each alternative cover has been used at the Landfill since January 1, 2020.

Gas Migration

47. In an unlocked, Excel-compatible spreadsheet, provide gas measurements at the gas probes located at the boundary of the Landfill, and include underlying documentation or statements from which you compiled the information in the spreadsheet, between January 1, 2020, and the date of this request.
48. Provide records of corrective actions taken and remediation plans made in response to methane readings in measurements taken at the probes.
49. Provide a map of the probe locations.