



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article No.: 7014 1200 0000 6119 1713

Mr. Timothy D. Curry
Advanced Disposal Services Maple Hill Landfill
31266 Intrepid Road
Macon, Missouri 63552

Dear Mr. Curry:

On April 7, 2023, on behalf of the Maple Hill Landfill, Marilyn Engel of SCS Engineers requested a modification to the facility's requirement to comply with 40 C.F.R. Part 62, Subpart OOO's Tier 2 testing procedures. The request was to approve a sample location in the header pipe near the flare downstream of condensate removal equipment.

40 C.F.R. 62.16718(a)(3) allows for the collection of the Method 25 or 25C sample from the header pipe of an active gas collection system instead of surface probes provided the removal system can be shown to provide sampling as representative as the two sampling probes per hectare requirement and the samples are collected before any gas moving, condensate removal, or treatment system equipment.

The Maple Hill Landfill has two header systems which combine in a condensate removal sump. There is no location upstream of the sump that is representative of the gas collection from both areas served by the two headers. Condensate in the headers falls to the bottom of the sump and exits via a drain. Landfill gas passes upward through a demister pad and out through the header pipe that leads to the blower and flare. This landfill does not use any type of treatment system to dehydrate the landfill gas or facilitate its condensation, such as a cooler. There is limited contact between the condensate and the gas. For example, the gas is not bubbled through the condensate. There would be some gas/liquid contact where the gas passes through the demister pad.

40 C.F.R. 60.8(b) allows the Administrator to approve changes to testing methods. Section 62.02(b)(2) adopts 60.8(b) allowing the Administrator to approve changes to Part 62, Subpart OOO test methods. This authority has been designated to the Branch Chief of the Regional Enforcement and Compliance Assurance Division. On behalf of the Administrator, I am approving the Tier 2 sample collection



Printed on Recycled Paper

location to allow the sample to be collected from the common header after the condensate removal sump and prior to the fan and flare. During the sample collection the demister pad shall be removed from the sump. Other than the removal of the demister pad, the system will be operated under normal operating conditions.

Sincerely,

TRACEY CASBURN

Digitally signed by
TRACEY CASBURN
Date: 2023.07.14
11:24:10 -05'00'

Tracey Casburn, Chief
Air Branch
Enforcement and Compliance Assurance Branch

cc: Marilyn Jones, SCS Engineers-MJones@scsengineers.com
Tia Jeter, P.E., SCS Engineers-TJeter@scsengineers.com
Richard Swartz, MoDNR