

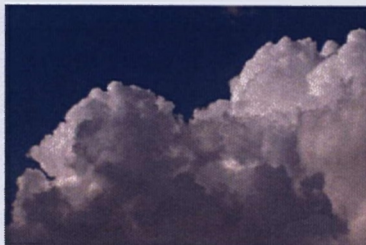


# West Lake Update

October 25, 2016

## Air Monitoring Continues in Bridgeton, Missouri

*This is the first of a three part series of the West Lake Update that will look at federal and state responsibilities and review some of the major air monitoring and Clean Air Act compliance efforts around the Bridgeton area. Part 1 will look at Clean Air Act compliance. Part 2 will look at EPA air monitoring. Part 3 will look at MDNR air monitoring and odors in the area.*



### Part 1 of 3: Clean Air Act Compliance

Many industrial sources emit air pollution in the St. Louis area, including power plants, manufacturers, asphalt plants and landfills. These sources of air emissions are permitted and regulated primarily by MDNR under a State Implementation Plan (SIP) required by the Clean Air Act (CAA) and approved by EPA. These sources are also subject to a number of federal regulations, such as requirements addressing air toxics emissions.

EPA and the Missouri Department of Natural Resources (MDNR) have complementary roles for ensuring industries comply with federal and state laws and regulations regarding air quality. EPA delegates portions of its authority for managing environmental programs to the states. As part of this delegation, MDNR has primary responsibility for managing the air program, which includes monitoring, permitting and enforcement. EPA provides partial funding to support the air activities and has general oversight responsibilities to ensure that national environmental goals are achieved. Both agencies work together to ensure compliance with the CAA.

### Inspections

From April to June 2016, EPA conducted twelve CAA compliance inspections of sources in the Bridgeton, Maryland Heights, and Earth City areas. The purpose of the EPA inspections is to ensure sources in these areas are in compliance with the CAA. These efforts are consistent with EPA

National Enforcement Initiatives – Cutting Hazardous Air Pollutants and Reducing Air Pollutions from the Largest Sources. Specifically, EPA focused compliance inspections on sources of air emissions of methane, sulfur compounds, and trichloroethene (TCE). One inspection, at the Champ Landfill located in Maryland Heights, found deficiencies with the landfill's surface emission monitoring and surface integrity monitoring required by the CAA New Source Performance Standard (NSPS) for Municipal Solid Waste landfills. These standards require landfills to collect and control air emissions of landfill gases, including methane.

### Champ Landfill Settlement

On August 11, 2016, EPA announced a settlement with Champ to bring them back into compliance by implementing numerous measures designed to minimize odors and landfill gas air emissions and ensure on-going compliance with regulatory requirements of the CAA. Under the terms of this settlement, Champ Landfill has agreed to conduct a comprehensive third party audit of its gas collection system and to implement all of the auditor's recommended corrective actions in less than one year. Champ Landfill will also install a minimum of 21 additional landfill gas extraction wells. These modifications to the gas collection system are expected to significantly improve its ability to collect gases generated by the landfill, resulting in lower emissions of landfill gas and odors to the surrounding community. Overall, Champ Landfill will spend up to an estimated \$1.6 million to implement the im-



provements at the landfill, including the additional wells, implementing the independent third party audit recommendations, and other expenditures.

As part of the settlement, Champ Landfill has agreed to spend nearly \$1.3 million to purchase four compressed natural gas (CNG) trash collec-



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tion trucks to replace existing diesel-fueled vehicles as a voluntary Supplemental Environmental Project (SEP). These CNG trash collection vehicles are expected to result in a significant reduction of particulate matter emissions compared to conventional diesel-fueled trucks currently being used.

### **Bridgeton Landfill**

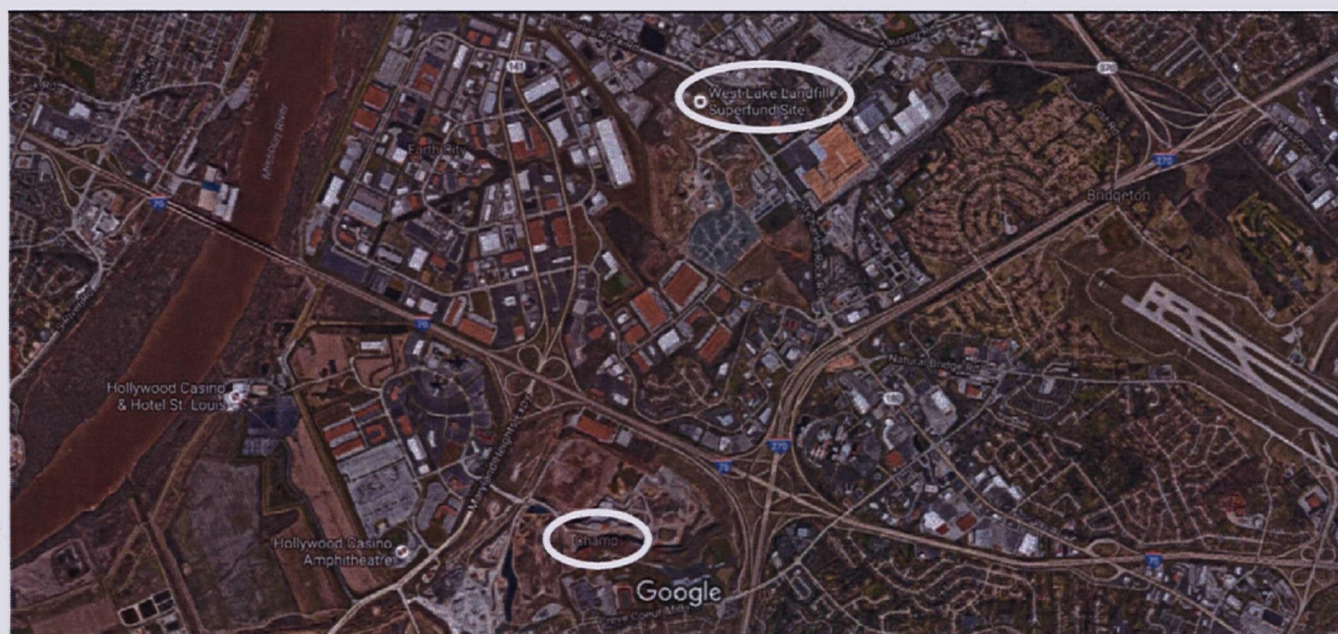
In addition to EPA's settlement with Champ Landfill, the State of Missouri has issued several Notices of Violation (NOVs) to Bridgeton Landfill, LLC, for air permitting violations. Specifically, the NOVs allege failure to comply with air permitting regulations governing sulfur dioxide (SO<sub>2</sub>) emissions from the Bridgeton Landfill flares. The State of Missouri and Bridgeton Landfill, LLC, are working toward resolving these alleged violations. Recently, MDNR received an air permit application from Bridgeton Landfill to install a post-combustion air pollution control system, including a thermal oxidizer and scrubber, to reduce SO<sub>2</sub> emissions from the Bridge-

ton Landfill below applicable permitting thresholds. MDNR is currently reviewing the permit application.

In addition to the Bridgeton and Champ Landfills there are other identified sources in the area that require monitoring and inspections to ensure compliance with the CAA. These sources include vehicle emissions from nearby roads and highways, and other industrial sources.

EPA and MDNR continue to conduct air monitoring and review the results for the area, require emissions reporting by sources of air toxics, and take actions where necessary to ensure sources are compliant with the CAA.

***Stay tuned for Part 2: EPA Air Monitoring.***



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