



REGION 7

LENEXA, KS 66219

May 1, 2026

SENT VIA ELECTRONIC MAIL
RECEIPT CONFIRMATION REQUESTED

Bret Stephens
Loess Hills Regional Sanitary Landfill
59722 290th Street
Malvern, Iowa 51551
bret.stephens@wasteconnections.com

RE: Higher Operating Value Request
Loess Hills Regional Sanitary Landfill
Facility ID Number: 110018868947

Dear Mr. Stephens:

On March 23, 2026, the U.S. Environmental Protection Agency received requests from SCS Engineers on behalf of Loess Hills Regional Sanitary Landfill to operate eight landfill wells at temperatures above the 145 degrees Fahrenheit (°F) threshold established in 40 CFR Part 63 Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. In accordance with 40 CFR § 63.1958(c)(2), the owner or operator [of a MSW landfill] may establish a higher operating temperature value at a particular well. A higher operating value (HOV) demonstration must be submitted to the Administrator for approval and must include supporting data demonstrating that the elevated parameter neither causes fires nor significantly inhibits anaerobic decomposition by killing methanogens. The demonstration must satisfy both criteria to be approved. Unless a higher operating temperature value has been approved by the Administrator, facilities with well temperatures above 145 °F are required to conduct enhanced monitoring, as outlined in 40 CFR § 63.1961(a)(5).

Loess Hills Requests

The well to be considered for a HOV and the requested temperature threshold are as follows:

LHGEW046R 160 °F

Background

In the letter referenced above, SCS Engineers stated Loess Hills is subject to 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 and 40 CFR Part 63 Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.

To justify its HOV request for higher temperatures, Loess Hills stated in its consultation with EPA on April 15, 2026, that the requested well is newly installed and replaces the well located in the adjacent area. LHGEW046R replaced LHGEW046. The replacement was needed to facilitate better collection of gases from this location as the waste mass had increased around the well area. The request stated that gas quality indicate consistent methane generation of about 45% and carbon monoxide of 40 ppmv. The facility indicates that the elevated temperature is not inhibiting anerobic decomposition by killing methanogens.

EPA Determination

EPA approves Loess Hills' requested HOV for the well LHGEW046R outlined on page 1 of this letter. As a condition of this approval, Loess Hills must measure CO either concurrently or within 5 days of any temperature measurement between 145 °F and the requested HOV and thereafter continue CO monitoring monthly. Afterward, if wellhead temperature levels remain below 145 °F, and three consecutive monthly CO readings register less than 100 ppmv, Loess Hills may cease monitoring for CO until such time as wellhead temperature levels again exceed 145 °F.

With this approval, the well identified above at Loess Hills continue to be subject to the enhanced monitoring requirements in 40 CFR § 63.1961(a)(5) for each well with a measurement of landfill gas temperature greater than 145 °F. These requirements include monitoring and determining carbon monoxide concentrations using EPA Method 10, per 40 CFR § 63.1961(a)(5)(vi). However, the EPA has approved alternative test methods ALT-143, ALT-144, or ALT-145 may be used in lieu of Method 10, provided the composition of the gas does not exhibit any known interferences beyond the requirements detailed in each of the alternatives.¹

The facility shall also take necessary precautions to ensure that the components of the gas collection system can work at the elevated temperatures represented in the request.

The conditional approval of this HOV request is effective for a period of two years from the issuance date, upon which time the facility may request a reevaluation of the HOV as appropriate under the applicable regulations.

Please note that this approval of the HOV does not preclude the EPA from pursuing appropriate enforcement actions, including penalties, for violations related to temperature exceedances or enhanced monitoring requirements that might have occurred prior to this approval. The penalties sought within such an enforcement action can be up to \$59,114 per violation per day of noncompliance.

¹ See 87 Fed. Reg. 3,296, 3,298 (Jan. 21, 2022).

If there are any questions regarding this letter, please contact Joe Terriquez at terriquez.joe@epa.gov or (913) 551-7105.

Sincerely,

VEDA HAKAMI
STOY

Digitally signed by VEDA
HAKAMI STOY
Date: 2026.05.04
12:36:22 -05'00'

Alyse Stoy
Acting Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency Region 7

Enclosure

cc: John Curtin- john.curtin@dnr.iowa.gov