



## OFFICE OF AIR QUALITY PLANNING AND STANDARDS

RESEARCH TRIANGLE PARK, NC 27711

September 18, 2025

Mrs. Jen Lennon  
Environmental Manager  
City of Spokane Solid Waste Disposal  
2900 S. Geiger Boulevard  
Spokane, Washington 99224

Dear Mrs. Lennon,

This letter is in response to the request of July 10, 2020, from Kelle Vigeland (City of Spokane) to Geoffery Glass (EPA Region 10) along with the follow up information provided to Jason DeWees in 2025 via email. With this request, you seek to modify an alternative testing approach granted to the City of Spokane's Northside Landfill (NSLF). The NSLF is located at West 5502 Nine Mile Road, Spokane, Washington. A discussion of your original request, the original approval and this modification request is included below.

It is our understanding that the NSLF is subject to 40 CFR part 60, Subpart Cc and must test to determine if non-methane organic compounds (NMOC) emissions are greater than 50 megagrams per year. According to the information provided in the original request letter (attached) of October 19, 1999, the landfill is covered with an impermeable membrane and has a gas collection system installed. You requested to test the collection system header instead of drilling holes into the landfill surface to perform Method 25C (40 CFR part 60, Subpart A) in order to maintain the integrity of the membrane.

The October 19, 1999, request was approved on December 8, 1999, and was signed by David Mobley of the EPA's Emissions Monitoring and Analysis Division. That approval letter (attached) allowed you to collect three NMOC samples from the collection system header but also required the concurrent collection and analysis of a composite sample from the condensate traps upstream of the header test site. This condensate trap collection and analysis was required to prevent a low bias in the NMOC measurement created by the condensate dropout.

On July 10, 2020, you submitted a request seeking to discontinue the condensate sampling portion of the alternative test method approach allowed in the December 8, 1999, approval

letter. To support your request, you provided condensate trap data indicating that the total NMOC from the condensate trap would be less than 1% of the sitewide NMOC emissions. Allowing this alternative request would avoid the cost of the collection and analysis of the condensate trap samples.

Based on a review of this request and the additional information provided, we approve your request to suspend the condensate trap sampling and analysis as required by the December 8, 1999, letter. However, you must continue to collect three NMOC samples from the collection system header. This approval letter is only applicable to compliance under 40 CFR part 60, Subpart Cc at the City of Spokane Solid Waste Disposal Landfill.

If you have any questions regarding this approval or need further assistance, please contact Kim Garnett at (919) 541- 1158 or [garnett.kim@epa.gov](mailto:garnett.kim@epa.gov).

Sincerely,

**STEFFAN  
JOHNSON**

Digitally signed by  
STEFFAN JOHNSON  
Date: 2025.09.17  
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Steffan M. Johnson, Group Leader  
Measurement Technology Group

#### attachments

cc: Kim Garnett, OAQPS/AQAD ([garnett.kim@epa.gov](mailto:garnett.kim@epa.gov))  
Geoffery Glass, Region 10 ([glass.geoffrey@epa.gov](mailto:glass.geoffrey@epa.gov))  
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