



**Region 2 Caribbean Environmental Protection Division
Multimedia Permits and Compliance Branch
Air Protection Team**

CAA Inspection Report

Inspection Date: April 30, 2024

Facility Name: Municipality of Arecibo Landfill

Facility Address: PR-682 Interior, Bo. Factor, Garrochales Sector, Arecibo, Puerto Rico

EPA Lead Inspector: Alex Rivera, 787-977-5845, rivera.alex@epa.gov

EPA Asst. Inspector(s): Gloria Díaz-Galarza, 787-977-5882, diaz-galarza.gloria@epa.gov
Daniel Heins, 202-565-0070, heins.daniel@epa.gov
Steven Rapp, 202-250-8961, rapp.steve@epa.gov
Victor Tu, 212-637-3476, tu.victor@epa.gov
Katherine Marmanides, 212-637-4063, marmanides.katherine@epa.gov
Maria Malave, 202-564-7027, malave.maria@epa.gov

Facility Contact(s): Cynthia B. Otero, Conwaste Environmental Compliance Division, (787) 366-6776, cotero@conwastepr.com; Hermes Camis, Facility Manager, (787) 354-8114, hcamis@conwastepr.com
José González, Operations Manager, 787-273-7639, jcgonzalez@conwastepr.com

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with Clean Air Act (“CAA”) regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Summary of Onsite Observations

A. Opening Conference

The representatives of the United States Environmental Protection Agency (USEPA), Alex Rivera, Gloria Diaz-Galarza, Victor Tu, Katherine Marmanides, Maria Malave, Steven Rapp, and Daniel Heins arrived at the Municipality of Arecibo Landfill (“MAL” or “facility”) located in PR-682 Interior, Factor Ward, Garrochales Sector in Arecibo, PR. at approximately 10:40 am. The EPA representatives (“the inspectors”) were met upon arrival by Mr. José González, Operations Manager, showed credentials and explained the purpose of the inspection. Mr. González contacted Mr. Hermes Camis, Facility Manager, via phone. Mr. Camis informed the inspectors that he was driving back to the facility, as he was at Conwaste’s operated landfill located in

Mayagüez, PR. However. Mr. Camis agreed on addressing questions from the inspectors. The following is a summary of the conversation with Mr. Camis:

1. Daily cover material – Mr. Camis informed that two types of cover material are being used, including dirt that is acquired from a nearby quarry and Posi-Shell¹. Mr. Camis added that approximately 1 foot of cover is applied.
2. Safety – Mr. Camis and Mr. González both confirmed that they were not aware of any dangerous areas that could affect the SEM inspection, and informed that the only challenge would be related to slippery areas and forecast of rain throughout the day.
3. Active waste dump areas – Mr. Camis informed that the south portion of the landfill is being used as active waste dump area.
4. Areas where waste has been in place fewer than 5 years – Mr. Camis indicated that around all landfill there is a possibility that the facility gas collection and control system (GCCS) could be collecting gas from waste in place fewer than 5 years.
5. Type of landfill gas monitoring wells – Mr. Camis informed that the landfill has 85 landfill gas monitoring wells, all regulatory and vertical.
6. Type of waste - Mr. Camis indicated that the facility receives construction debris mixed with municipal solid waste.
7. GCCS status – Mr. Camis informed that the facility GCCS was in operation at the time of the inspection and that around 6 gas monitoring wells were disconnected to allow activities in the active dump area. Mr. Camis stated that these wells are located within the south facing area of the landfill and have been disconnected since the beginning of April.
8. SEM – Mr. Camis indicated that SEM is conducted in-house, and that the facility technician in charge of conducting SEM was going to be available for joining the inspectors around 12 PM. Mr. Camis confirmed that regularly no SEM exceedances are found and that a Landtec SEM 5000 instrument is used for conducting SEM.

B. Walkthrough/SEM

After completing the discussion, the inspectors agreed with Mr. Camis on providing a detailed summary of the SEM inspection observations during the inspection closing meeting. Mr. Carlos Fernández, GCCS Operator and SEM technician agreed on assisting the inspectors during the monitoring. The SEM started around 11:40 AM. During the SEM, inspectors asked Mr. Fernández questions about his monitoring practice. In response to these questions, he stated that he monitors penetrations by just placing the probe tip near the wellhead for twice the response time but does not check fully around each penetration point. When asked if he would check areas of exposed waste off of his monitoring path, he stated that he would not. He stated that he was performing his SEM in the manner in which he was trained. EPA inspectors provided feedback on compliant SEM practices. The inspectors concluded the SEM around 4:00 PM. See Appendix A (SEM Data), Appendix B (SEM Map), Appendix C (Photo Log), Appendix D (Instrument & Calibration Data) and closing meeting discussion summary for details about the SEM findings and observations.

¹ <https://www.lscenv.com/landfill-cover-systems-pg.html> - Posi-Shell®

Closing Meeting

At approximately 4:15 PM, the inspectors returned to the facility office trailer for a closing conference with Mr. Camis. As agreed during the inspection opening meeting, the inspectors discussed with Mr. Camis the main findings and observations during the SEM. The following is a summary of the conversation:

1. Significant number of uncapped GCCS wellheads found. The inspectors noted that it appeared to be a consistent practice for fully offline wells to be directly venting to atmosphere.
2. Offline wells. The inspectors noted the wells that were fully offline, resulting in a lack of gas collection and elevated surface methane readings in areas subject to gas collection requirements.
3. Although the monitoring activity did not cover the entire extent of the facility SEM plan, the inspectors were able to find over 70 different locations with surface concentrations of methane over 500 ppm.
4. Significant leachate breakouts observed throughout the walkthrough. Mr. Camis was informed that although cover integrity issues were the common denominator for most of these breakouts, leachate breakouts could also be observed in areas without erosion issues too. The inspectors noted that the number of leachate breakthroughs could also indicate that numerous wells are watered-in and therefore not able to carry the quantity of gas as designed.
5. Significant vegetation growth at the edges of the landfill presents a challenge to properly conduct SEM.
6. Disparity between the inspectors SEM findings and what it is being reported in the facility SEM quarterly reports. The SEM reports EPA reviewed from 2021 and 2022 prior to inspection reported 0 exceedances in every quarter, and the opening conference confirmed that facility still does not find SEM exceedances.
7. Lack of knowledge about how to properly conduct SEM. In example, not monitoring the entire well circumference as required by EPA Method 21². The inspectors encouraged Mr. Camis to provide proper training or refreshers to Mr. Fernández and more resources since Mr. Fernández is the only technician conducting SEM and also operating the GCCS.
8. Exposed waste, lack of adequate cover issues observed throughout the walkthrough. Mr. Camis indicated that the facility is planning to use hydroseeding at several areas to improve the cover issues.
9. Cover integrity issues generating avenues for gases to migrate through the landfill surface into the atmosphere.
10. Wells venting to the atmosphere - The inspectors provided examples such as wellhead #20, that according to Mr. Fernández it was allegedly broken by a cow that got access to the landfill, the wellhead was venting to the atmosphere with methane concentrations at the top of over 300,000 ppm and 30,000 ppm from its base. The inspectors also mentioned several wellheads that were found under positive pressure. Mr. Camis

² https://www.epa.gov/sites/default/files/2017-08/documents/method_21.pdf

acknowledge that they have a few wellheads experiencing positive pressure and explained that some wellheads were showing an increment in oxygen concentrations, and they restricted its flow to mitigate the issue. The inspectors indicated to Mr. Camis that such condition could be a result of having vacuum leaks, which was also part of the issues observed at some wellheads, and that such condition will indeed allow oxygen levels to be increased. The inspectors recommended that rather than restricting the wellhead flow, the facility can try to find and resolve the vacuum leaks and that as found during the SEM, some of these vacuum leaks can be easily heard.

11. The inspectors asked Mr. Camis about the gas volume that is being processed at the facility flares. Mr. Camis indicated that they are currently managing around 310 scfm. The inspectors told Mr. Camis that such amount is low for the landfill size, but consistent with the number of methane found migrating through the landfill surface.
12. The inspectors informed Mr. Camis that the SEM data along with other supplement documentation such as maps will be shared via email with him and Ms. Cynthia Otero as soon as possible³. The inspectors also informed Mr. Camis that corrective actions should be coordinated as soon as the SEM data becomes available to the facility⁴. Also Mr. Camis was informed that the SEM findings along with the respective corrective actions should be included in the corresponding SEM quarterly report.
13. The inspectors also informed Mr. Camis that an inspection report will be prepared and shared with him and Ms. Cynthia Otero within approximately 60 days.

The inspectors expressed gratitude for all the assistance provided during the inspection and all the cooperation to provide the information needed to complete the inspection. The inspectors concluded the inspection at 5:00 PM.

Appendices

Appendix A - SEM Data

Appendix B - SEM Map

Appendix C - Photo Log

Appendix D - Instrument & Calibration Data

³ On May 2, 2024, EPA's Daniel Heins sent the SEM documentation to Conwaste's Hermes Camis and Cynthia Otero via email.

⁴On May 1, 2024, Conwaste's Hermes Camis sent to EPA's Alex Rivera an email containing a series of pictures documenting a series of corrective actions to resolve or mitigate some of the issues found during EPA's SEM inspection.

End of Report

Lead Inspector's Name: Alex Rivera

ALEX
RIVERA

Digitally signed by ALEX
RIVERA
Date: 2024.06.03
14:59:14 -04'00'

Supervisor's Name: Nancy Rodríguez

NANCY
RODRIGUEZ

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NANCY RODRIGUEZ
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Appendix A: SEM Data

SEM Exceedances

ID	Description	Time	Reading ppm	Latitude	Longitude
A1	Pipe horizontal	12:00	6449	18.46638	-66.62420
A2	Pipe horizontal	12:04	7500	18.46629	-66.62372
A3	Well 33	12:09	1175	18.46647	-66.62380
A4	Well 34	12:12	107223	18.46654	-66.62350
A5	Well 35	12:15	818	18.46670	-66.62308
A6	Exposed waste	12:19	1033	18.46650	-66.62275
A7	well	12:25	25164	18.46664	-66.62199
A8	Exposed waste/rill	12:31	690	18.46644	-66.62148
A9	Well 38	12:34	72977	18.46641	-66.62139
A10	Exposed waste	12:36	520	18.46639	-66.62119
A11	Exposed waste	12:39	761	18.46641	-66.62116
A12	Well with #79160	12:43	3502	18.46650	-66.62080
A13	Well with #73039	12:47	1117	18.46647	-66.62035
A14	Exposed waste/erosion	12:57	1609	18.46669	-66.62017
A15	Pipe sticking out	13:01	20282	18.46642	-66.62002
A16	Well 41	13:03	4899	18.46654	-66.61971
A17	Well 42	13:07	1115	18.46649	-66.61914
A18	Well 43	13:10	3373	18.46646	-66.61854
A19	Well 30	13:12	43195	18.46676	-66.61872
A20	Erosion	13:15	2718	18.46668	-66.61869
A21	Well 44	13:18	12075	18.46639	-66.61799
A22	Well 13	13:24	2941	18.46666	-66.61748
A23	Well 14	13:26	1367	18.46673	-66.61702
A24	Well 15	13:28	1830	18.46648	-66.61701
A25	Well 16	13:31	977	18.46614	-66.61709
A26	Well with #79170	13:37	8946	18.46589	-66.61770
A27	Well 18	13:42	1155	18.46536	-66.61784
A28	Well 64	13:45	1009	18.46546	-66.61802
A29	Well 19 + waste	13:51	10895	18.46485	-66.61805
A30	Well 20 (base and venting at top)	13:53	311877 at top; 3000 at base	18.46455	-66.61824
A31	Well 21	13:59	1037	18.46421	-66.61871
A32	Well 22	14:03	4274	18.46385	-66.61931
A33	Well 23	14:05	1140	18.46371	-66.61968
A34	Well 24	14:07	10052	18.46378	-66.62009
A35	Well 25	14:09	8305	18.46395	-66.62064
A36	Well with #79033, out sampling port and base	14:11	200000 at top; 2099 at base	18.46410	-66.62069
A37	Exposed waste and erosion	14:15	810	18.46408	-66.62045
A38	Unknown well - coming out top and base	14:16	240000 at top; 46515 at base	18.46400	-66.62017

A39	Well and exposed waste	14:22	11825	18.46399	-66.61958
A40	Leaks on sides drain	14:23	3477	18.46409	-66.61959
A41	Capped PVC pipe (offline well 77)	14:29	3300	18.46441	-66.61959
A42	Well 70	14:32	2035	18.46494	-66.61934
A43	Tire (exposed waste)	14:33	780	18.46495	-66.61924
A44	Unknown well	14:39	4878	18.46549	-66.61905
A45	Well 53	14:42	9492	18.46596	-66.61880
A46	Unknown well	14:49	58983	18.46504	-66.61987
A47	Well 61	14:51	8616	18.46552	-66.62022
A48	Exposed waste (cushion)	14:52	735	18.46557	-66.62048
A49	Well 60	14:55	12434	18.46561	-66.62077
A50	Well with #78187	14:57	62465	18.46563	-66.62131
A51	Venting uncapped disconnected well (exceedance at base and top)	15:03	205000 at top; 86705 at base	18.46613	-66.62217
A52	Venting uncapped disconnected well (exceedance at base and top)	15:05	150000 at top; 7479 at base	18.46567	-66.62188
A53	Venting uncapped disconnected well	15:18	205864 at top	18.46622	-66.62274
A54	Unknown well	15:21	41781	18.46613	-66.62310
A55	Exposed waste	15:26	2067	18.46633	-66.62365
B1	Well 72	13:52	4691	18.46503	-66.61830
B2	Leachate breakout near well 72	13:55	621	18.46502	-66.61837
B3	Uncovered pipe	14:00	5863	18.46455	-66.61863
B4/B5	Well 78, also open vent out of monitoring reach and pipe not attached to cap	14:11	5736 at wellhead; 1634 at pipe	18.46453	-66.61903
B6/B7	Well 85 at well and uncapped pipe	14:20	73025 at pipe; 38000 at base	18.46420	-66.61909
B8/B9	Well 72 head disconnected from header - hole of wellhead	14:33	6294 wellhead; 2612 at hole	18.46491	-66.61877
B10	Well 63	14:38	6920	18.46545	-66.61850
B11	Well 54 - extended with no cap	14:41	85540	18.46589	-66.61825
B12/13	Well 52 base + connector leak	14:46	7843 at base; 956 at connector leak	18.46602	-66.61933
B14	Well 51	14:50	4731	18.46606	-66.61999
B15	Well 50	14:52	27687	18.46601	-66.62051
B16	Well 49	14:55	1807	18.46604	-66.62102
B17	Well 48	14:59	4042	18.46609	-66.62162
B18	Open wellhead	15:18	52022	18.46576	-66.62249
B19	Wellhead	15:22	4712	18.46552	-66.62271
B20	Wellhead	15:24	24628	18.46571	-66.62288
B21	Header exiting landfill	15:27	3554	18.46600	-66.62328
B22	Dirt under header pipe	15:29	3369	18.46621	-66.62352
B23	Valve and header coming out of ground	15:34	507	18.46638	-66.62413

Exceedances in the A survey were detected using the AED IRwin by Daniel Heins. Exceedances in the B survey were detected using the R2 IRwin by Victor Tu and Katherine Marmanides.

Probe tips were fixed on hiking poles 8 cm from the base of the pole, all readings taken from 8 to 10 cm from the ground with the exception of secondary readings noted from venting collection infrastructure. A53 is the only reading not associated with a confirmed surface exceedance.

Note: Some co-located exceedances were condensed into single points for the above table and the below map.

Background readings:

Upwind: 0 ppm

Downwind: 2 ppm

74 exceedances total:

500 – 1,000 ppm: 10

1,000 – 5,000: 29

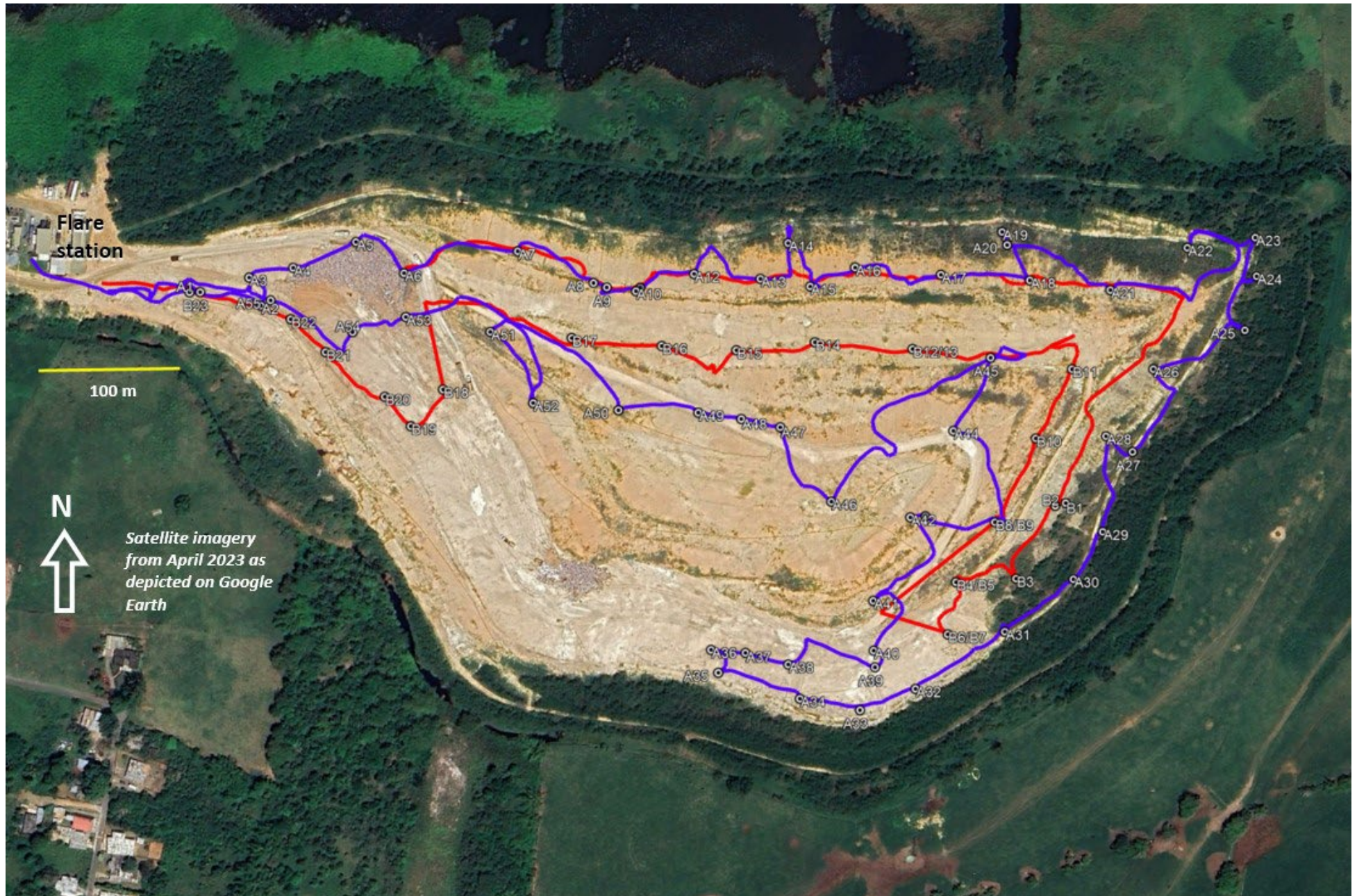
5,000 – 10,000: 11

10,000 – 50,000: 11

50,000 – 100,000: 6

> 100,000: 7

Appendix B: SEM Map




Blue and red lines trace each team's monitoring path. Exceedances are plotted and labeled as described in Appendix A.

The survey covered less than 32 acres of the landfill.

Appendix C: Photo Log for Municipality of Arecibo Landfill, Arecibo, PR

Facility Address: PR-682 Interior, Bo. Factor, Garrochales Sector, Arecibo, Puerto Rico	EPA Inspectors: Alex Rivera, Gloria Diaz-Galarza, Daniel Heins, Steven Rapp, Maria Malave, Katherine Marmanides, and Victor Tu	Image numbers: P4300046 through P4300123 Camera Used: Olympus TG-6 Digital Camera (EPA Decal # S63861)
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Image Number	File Name	Description	Date Taken	Time taken
1	P4300046.JPG	 <p style="text-align: center;"><i>Note: Time stamp reflect Pacific Time</i></p>	4/30/2024	1121
2	P4300047.JPG		4/30/2024	1124

3	P4300048.JPG	 <p>2024/04/30 11:35</p>	4/30/2024	1135
4	P4300049.JPG	 <p>2024/04/30 11:35</p>	4/30/2024	1135

Enclosed flare stack (right)

Enclosed flare stack (left)

5	P4300050.JPG	 <p>A photograph of industrial equipment, including a scrubber, located under a covered structure. The equipment consists of several vertical cylindrical tanks connected by a network of pipes and valves. A large green container is visible on the right side. A timestamp in the bottom right corner of the image reads "2024/04/30 11:36".</p>	4/30/2024	1136
6	P4300051.JPG	 <p>A photograph of a large, vertical, cylindrical stainless steel tank mounted on a yellow concrete base. The tank is situated outdoors behind a chain-link fence. In the background, a blue truck and a green container are visible. A timestamp in the bottom right corner of the image reads "2024/04/30 11:50".</p>	4/30/2024	1150

7	P4300052.JPG		4/30/2024	1202
Horizontal pipe penetrating ground			4/30/2024	1205
Horizontal pipe penetrating ground				

9	P4300054.JPG	 <p>2024/04/30 12:07</p>	4/30/2024	1207
		Exposed waste		
10	P4300055.JPG	 <p>2024/04/30 12:08</p>	4/30/2024	1208
		Landfill gas monitoring well #33		

11	P4300056.JPG	 <p data-bbox="575 699 911 727">Landfill gas monitoring well #34</p>	4/30/2024	1213
12	P4300057.JPG	 <p data-bbox="575 1386 716 1414">Woody shrub</p>	4/30/2024	1214

13	P4300058.JPG	 <p>2024/04/30 12:16</p>	4/30/2024	1216
Landfill gas monitoring well #35		 <p>2024/04/30 12:19</p>	4/30/2024	1219
		Exposed waste		

15	P4300060.JPG		4/30/2024	1224
16	P4300061.JPG		4/30/2024	1226

Exposed waste

Unidentified landfill gas monitoring well

17	P4300062.JPG	 <p data-bbox="575 678 688 711">Erosion rill</p>	4/30/2024	1231
18	P4300063.JPG	 <p data-bbox="575 1360 919 1386">Landfill gas monitoring well #79</p>	4/30/2024	1235

19	P4300064.JPG	 <p>2024/04/30 12:37</p>	4/30/2024	1237
20	P4300065.JPG	 <p>2024/04/30 12:40</p>	4/30/2024	1240

Exposed waste

Exposed waste

21	P4300066.JPG		4/30/2024	1241
		Vegetation at bottom of the slope near adjacent waterbody		
22	P4300067.JPG		4/30/2024	1243
		Landfill gas monitoring well #38 (tag # 79179)		

23	P4300068.JPG		4/30/2024	1245
EPA inspector conducting SEM in vegetated area near adjacent waterbody			4/30/2024	1247
Landfill gas monitoring well (tag # 73039)				

25	P4300070.JPG	 <p>2024/04/30 12:56</p>	4/30/2024	1256
26	P4300071.JPG	 <p>2024/04/30 12:58</p>	4/30/2024	1258

EPA inspector next to a fully grown papaya tree

Erosion exposed waste and vegetation

27	P4300072.JPG		4/30/2024	1302
Pipe sticking out of ground			4/30/2024	1304
Landfill gas monitoring well #41				

29	P4300074.JPG	 <p data-bbox="575 695 905 727">Leachate seep on hill of landfill</p>	4/30/2024	1306
30	P4300075.JPG	 <p data-bbox="575 1385 816 1414">Leachate discoloration</p>	4/30/2024	1306

31	P4300076.JPG	 <p data-bbox="575 672 915 699">Landfill gas monitoring well #42</p>	4/30/2024	1308
32	P4300077.JPG	 <p data-bbox="575 1395 915 1422">Landfill gas monitoring well #43</p>	4/30/2024	1311

33	P4300078.JPG	 <p data-bbox="575 665 1411 695">Landfill gas monitoring well #30</p>	4/30/2024	1313
34	P4300079.JPG	 <p data-bbox="575 1388 1411 1421">Erosion exposed waste and vegetation</p>	4/30/2024	1316

35	P4300080.JPG	 <p>2024/04/30 13:18</p>	4/30/2024	1318
36	P4300081.JPG	 <p>2024/04/30 13:20</p>	4/30/2024	1320

Leachate breakout and open pipe

Landfill gas monitoring well #44

37	P4300082.JPG	 <p data-bbox="573 699 1367 727">Landfill gas monitoring well #13 surrounded by thick vegetation of >4 feet.</p>	4/30/2024	1325
38	P4300083.JPG	 <p data-bbox="573 1390 1192 1414">Landfill gas monitoring well #14 surrounded by vegetation</p>	4/30/2024	1327

39	P4300084.JPG	 <p data-bbox="573 699 915 727">Landfill gas monitoring well #15</p>	4/30/2024	1329
40	P4300085.JPG	 <p data-bbox="573 1391 915 1421">Landfill gas monitoring well #16</p>	4/30/2024	1331

41	P4300086.JPG	 <p data-bbox="573 683 1010 711">Landfill gas monitoring well (tag #79170)</p>	4/30/2024	1336
42	P4300087.JPG	 <p data-bbox="573 1393 919 1422">Landfill gas monitoring well #18</p>	4/30/2024	1343

43	P4300088.JPG		4/30/2024	1344
44	P4300089.JPG		4/30/2024	1346


Exposed waste

Landfill gas monitoring well #64

45	P4300090.JPG	 <p data-bbox="573 683 913 711">Landfill gas monitoring well #19</p>	4/30/2024	1351
46	P4300091.JPG	 <p data-bbox="573 1365 1507 1424">Landfill gas monitoring well #20. Methane leak of >300,000 ppm at the top because top was missing. Exposed waste and 3,000 ppm methane concentration at its base.</p>	4/30/2024	1354

47	P4300092.JPG	 <p data-bbox="571 662 913 690">Landfill gas monitoring well #21</p>	4/30/2024	1400
48	P4300093.JPG	 <p data-bbox="571 1393 913 1421">Landfill gas monitoring well #22</p>	4/30/2024	1404

49	P4300094.JPG	 <p>Landfill gas monitoring well #23</p>	4/30/2024	1406
50	P4300095.JPG	 <p>Landfill gas monitoring well #24</p>	4/30/2024	1408

51	P4300096.JPG	 <p>2024/04/30 14:10</p>	4/30/2024	1410
Landfill gas monitoring well #25		 <p>2024/04/30 14:11</p>	4/30/2024	1411
Landfill gas monitoring well (tag #79033) venting through sampling port and base				

53	P4300098.JPG		4/30/2024	1415		
Exposed waste and erosion		54	P4300099.JPG		4/30/2024	1417
Unidentified landfill gas monitoring well venting through top and base						


55	P4300100.JPG	 <p data-bbox="573 703 810 727">Exposed waste and rill</p>	4/30/2024	1420
56	P4300101.JPG	 <p data-bbox="573 1396 810 1421">Exposed waste and rill</p>	4/30/2024	1420

57	P4300102.JPG	 <p>2024/04/30 14:23</p>	4/30/2024	1423
		Unidentified landfill gas monitoring well and exposed well		
58	P4300103.JPG	 <p>2024/04/30 14:24</p>	4/30/2024	1424
		Leaks found on side of drainage pipe		

59	P4300104.JPG	 <p data-bbox="575 695 1446 727">Capped PVC pipe, offline landfill gas monitoring well #77</p>	4/30/2024	1430
60	P4300105.JPG	 <p data-bbox="575 1385 1446 1414">Landfill gas monitoring well #70</p>	4/30/2024	1433

61	P4300106.JPG	 <p>2024/04/30 14:34</p>	4/30/2024	1434
Exposed waste		 <p>2024/04/30 14:36</p>	4/30/2024	1440
Unidentified landfill gas monitoring well				

63	P4300108.JPG	 <p data-bbox="575 699 913 727">Landfill gas monitoring well #53</p>	4/30/2024	1443
64	P4300109.JPG	 <p data-bbox="575 1391 997 1421">Unidentified landfill gas monitoring well</p>	4/30/2024	1450

65	P4300110.JPG	 <p data-bbox="573 699 913 727">Landfill gas monitoring well #61</p>	4/30/2024	1452
66	P4300111.JPG	 <p data-bbox="573 1390 735 1421">Exposed waste</p>	4/30/2024	1454

67	P4300112.JPG	 <p data-bbox="573 699 1455 727">Landfill gas monitoring well #60</p>	4/30/2024	1455
68	P4300113.JPG	 <p data-bbox="573 1390 1455 1421">Landfill gas monitoring well (tag # 78187)</p>	4/30/2024	1458

69	P4300114.JPG	 <p data-bbox="573 675 1535 732">Venting uncapped and disconnected landfill gas monitoring well (exceedance at base and top)</p>	4/30/2024	1504
70	P4300115.JPG	 <p data-bbox="573 1373 1535 1429">Venting uncapped and disconnected landfill gas monitoring well (exceedance at base and top)</p>	4/30/2024	1506

71	P4300116.JPG	 <p data-bbox="573 659 1524 721">Venting uncapped and disconnected landfill gas monitoring well (exceedance at base and top)</p>	4/30/2024	1507
72	P4300117.JPG	 <p data-bbox="573 1343 1524 1409">Venting uncapped and disconnected landfill gas monitoring well (exceedance at base and top), showing condensation and bubbles at edge of opening</p>	4/30/2024	1507

73	P4300118.JPG	 <p data-bbox="573 686 1524 743">Venting uncapped and disconnected landfill gas monitoring well (exceedance at base and top)</p>	4/30/2024	1508
74	P4300119.JPG	 <p data-bbox="573 1398 1062 1424">Venting uncapped landfill gas monitoring well</p>	4/30/2024	1519

75	P4300120.JPG	 <p data-bbox="575 683 1520 743">Venting uncapped landfill gas monitoring well with white goods pile in background (right side)</p>	4/30/2024	1519
76	P4300121.JPG	 <p data-bbox="575 1393 1520 1424">Unidentified landfill gas monitoring well</p>	4/30/2024	1522

77	P4300122.JPG		4/30/2024	1527
		Exposed waste		
78	P4300123.JPG		4/30/2024	1527
		South facing portion of the landfill and white good pile in background (upper right side)		

Appendix D: Instrument and Calibration Data

The survey was conducted using two (2) Inficon IRwin devices using the Elkins Earthworks software. They are referred to throughout this report as the “AED IRwin” and the “R2 IRwin”

Instrument Information

	Instrument Type	Formal Identifier
AED IRwin	Inficon IRwin	SX # 580-01092006439
R2 IRwin	Inficon IRwin	SX # 580-01092005497

Calibration, Response Time and Precision Checks

Trial	Calibration Gas ppm	R2 IRwin		AED IRwin	
		Reading (ppm)	Time (s)	Reading (ppm)	Time (s)
1	500	500	5	500	5
2	500	500	5	500	4
3	500	490	4	500	5

Both instruments were calibrated and checked for response time and precision on April 30, 2024 at 10am using zero air and 500 ppm methane. All readings are within 10% of the known calibration value. Response times are approximately 4-5 seconds, under the maximum of 30 seconds.

This also served as the initial calibration pre-inspection bump check, showing successful calibration.

Post Survey Calibration Checks

Date/Time	Gas Concentration (ppm)	R2 IRwin Reading (ppm)	AED IRwin Reading (ppm)
2024-04-30 15:55	500	400	490

Post-survey bump check show maintenance of calibration for the AED IRwin and downward drift for the R2 IRwin, possibly resulting in false negatives (ie, missed exceedances) and potential underestimation of the severity of measured exceedances.

Calibration Gas

Composition	Manufacturer	Lot Number	Expiration Date
Zero air <1 ppm total hydrocarbon	Airgas	304-402941563-1	2/23/2028
500 ppm methane in air	Airgas	304-402960982-1	2/2/2028