



## REGION 1

BOSTON, MA 02109

### Clean Air Act Inspection Report

**Report Date:** April 3, 2025

#### **I. Background**

**Inspection Date:** March 19, 2025

**Inspection Type:** Partial Compliance Evaluation

**EPA Inspector:** Davianna Vasconcelos, Enforcement and Compliance Assurance Division, Air Compliance Section

**DAVIANNA**

**VASCONCELOS**

Digitally signed by DAVIANNA  
VASCONCELOS

Date: 2025.04.03 12:12:12 -04'00'

**EPA Reviewer:** John Melcher, Senior Enforcement Coordinator, Air Compliance Section

**JOHN**

**MELCHER**

Digitally signed by JOHN  
MELCHER

Date: 2025.04.03 15:29:17  
-04'00'

**Facility Name:** Manchester Landfill

**ICIS Air ID#:** CT0000000900309058

**Facility Location:** 1 Landfill Way, Manchester, CT 06040

**Mailing Address:** Same as above

#### **Disclaimer:**

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

## Small Business Resources Information Sheet:

Without making a determination that your business or organization is a small business, EPA is providing you with this Small Business Resource Information Sheet regarding information that may assist small businesses in identifying and complying with environmental requirements:

<https://www.epa.gov/sites/default/files/2017-06/documents/smallbusinessinfo.pdf>

## Inspection Attendees:

| Name                 | Title                                      | Organization                                         |
|----------------------|--------------------------------------------|------------------------------------------------------|
| Davianna Vasconcelos | Environmental Engineer                     | EPA R1                                               |
| Scott Atkin          | Environmental Service Manager              | Manchester Department of Public Works and Sanitation |
| Bryan Pepper         | Environmental Scientist                    | TRC                                                  |
| Nate Lochowski       | Environmental Technician II                | TRC                                                  |
| Dominik Grzywacz     | Air Pollution Control Engineer             | CT DEEP                                              |
| Jocelyn Phung        | Air Pollution Control Engineer             | CT DEEP                                              |
| John DeGirolamo      | Supervising Air Pollution Control Engineer | CT DEEP                                              |

## Facility/Process Description:

Taken from CT DEEP New Source Review Permit 097-0114 (Issued January 10, 2024):

“The Manchester Landfill has accepted waste, including municipal solid waste (MSW), since the 1950’s. The landfill ceased acceptance of MSW on January 1, 2000. The landfill has a design capacity greater than 2.5 million megagrams by mass and 2.5 million cubic meters by volume. The wastes currently being disposed of at the landfill consist of commercial and residential construction debris, bulky waste, and certain Connecticut-regulated special wastes.

The Manchester Landfill voluntarily installed a gas collection and odor control system (GCOCS) in 2001 for the control of odors from this landfill. Although the landfill is subject to 40 CFR Part 60 Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills, the Manchester Landfill is not required to install and operate the GCOCS system to comply with Subpart XXX since the non-methane organic compound (NMOC) generation rate is below 34 megagrams per year.”

## Potentially Applicable Federal Air Regulations:

The following federal air regulations may be applicable to the Facility:

- 40 CFR Part 60, Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills

## State Air Permit:

- CT DEEP Title V Permit 097-0127-TV
- CT DEEP New Source Review Permit 097-0114

## **Previous Enforcement Actions:**

A “Detailed Facility Report” from EPA’s Enforcement and Compliance History Online (ECHO) database indicates that EPA has taken no informal or formal enforcement actions taken against Manchester Landfill with respect to this facility in the past five years. ECHO indicates that CT DEEP issued three Notices of Violation to the facility in 2021.

## **II. Inspection**

### ***A. Opening Conference:***

EPA inspector Davianna Vasconcelos arrived at the facility at approximately 8:30 a.m. and met the inspection attendees in the parking lot. Bryan Pepper, of TRC, initiated an in-brief explaining the purpose of the day was to conduct the landfill’s Surface Emissions Monitoring (SEM) quarterly event. Mr. Pepper explained that the monitoring will be comprised of one reading per 30 by 30-meter cell that were pre-determined via a schematic. CT DEEP representatives explained that they would be driving their vehicle, which was equipped with Geospatial Measurement of Air Pollution (GMAP) equipment, around the landfill to measure potential emissions. Ms. Vasconcelos explained that EPA’s purpose was to support the state in their efforts and observe the SEM event. Ms. Vasconcelos presented her credential to the inspection attendees.

Scott Atkin, of Manchester Department of Public Works and Sanitation, and CT DEEP representatives got into their respective vehicles and began the GMAP monitoring effort. Ms. Vasconcelos joined Mr. Pepper in his vehicle and drove to the top of the landfill. Nate Lochowski, of TRC, followed Mr. Pepper in his own vehicle to the top of the landfill. Mr. Pepper explained that TRC would be using a new software “Fulcrum” to record the SEM values. Mr. Pepper explained that Fulcrum is a web-based app that can be used to track and record completed cells and their observed values. Mr. Pepper explained that he was using a LandTec SEM5000 calibrated for methane only. Mr. Pepper said he conducted three in-field calibration checks with 500 ppm methane which resulted in readings of 507 ppm, 508 ppm, and 507 ppm. Mr. Pepper said that there was no plan to monitor at penetrations in the landfill.

### ***B. Facility Tour***

Mr. Pepper and Mr. Lochowski began the SEM effort and Ms. Vasconcelos observed.

At approximately 9:55 a.m., Mr. Atkin called Ms. Vasconcelos saying that his truck was stuck in mud on a perimeter road of the landfill and he presumed the CT DEEP GMAP vehicle was stuck as well as they were no longer with him. Ms. Vasconcelos called Dominik Grzywacz, of CT DEEP, and confirmed that the GMAP vehicle was stuck in the mud. Ms. Vasconcelos continued to observe Mr. Pepper and Mr. Lochowski conduct the SEM while CT DEEP representatives and landfill employees attempted to free the stuck vehicles from the mud.

Ms. Vasconcelos observed the flare from the top of the landfill and noted it was operational and appeared to have good combustion based on the lack of flame and smoke.

Part way through the monitoring, Jocelyn Phung, of CT DEEP, joined the monitoring group for some of the cells and used a handheld photoionization detector (PID). Ms. Phung did not indicate that she found any areas of concern.

The monitoring group scanned an area on the northeast side of the landfill that Mr. Pepper explained was identified as an exceedance the quarter prior. Mr. Pepper said that corrective actions had been taken to address the exceedance. The monitoring group did not find an exceedance in the area.

At approximately 12:30 p.m., CT DEEP GMAP vehicle was freed from the mud.

The group took lunch from approximately 1:10 p.m. to 1:45 p.m. CT DEEP representatives left the facility at approximately 1:20 p.m.

Mr. Pepper said that if an emission spike is found while walking from one cell to another, the typical process is to stop and investigate where the spike is originating from and record that value. Mr. Pepper said that if a cell already has a recorded value, the higher of the two values would be recorded for that cell.

TRC representatives did not indicate that they found any readings over the exceedance threshold throughout the entirety of the day.

Mr. Pepper said that he does not typically conduct upwind or downwind readings at least 30 meters from the edge of the landfill.

Ms. Vasconcelos noted that no major odors were noticed around the flare.

### ***C. Closing Conference***

Mr. Pepper, Mr. Lochowski, and Ms. Vasconcelos returned to the parking lot. Ms. Vasconcelos said that an inspection report would be written and sent to the facility. Mr. Pepper said the report could be sent to Mr. Atkin and he would forward it to TRC representatives if necessary.

Ms. Vasconcelos thanked TRC representatives for their time and cooperation. Ms. Vasconcelos departed the facility at 3:10 p.m.