



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: April 7, 2021

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Apex Landfill, Amsterdam, Ohio

FROM: Vicky Mei, Environmental Engineer
AECAB (IL/IN)

THRU: Constantinos Loukeris, Acting Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Apex Landfill

Facility Location: 11 Co Hwy, Amsterdam, Ohio 43903

Date of Inspection: March 11, 2021

EPA Inspector(s):

1. Vicky Mei, Environmental Engineer
2. Daniel Heins, Environmental Scientist
3. Karina Kuc, Environmental Scientist
4. Alexandra Letuchy, Environmental Engineer

Other Attendees:

1. Bryan Largent, Landfill Engineer, Apex Landfill
2. Angela Ramirez, Consultant, CEC
3. Anna Rosswog, Environmental Specialist, Montauk
4. Stephen Lynch, Facilities Manager, Montauk

Contact Email Address: blargent@interstatewaste.com

Purpose of Inspection: Clean Air Act Inspection

Facility Type: Municipal Solid Waste (MSW) Landfill

Regulations Central to Inspection: New Source Performance Standards Subpart WWW and XXX; National Emission Standards for Hazardous Air Pollutants Subpart AAAAA

Arrival Time: 1:00 P.M.

Departure Time: 1:45 P.M.

Inspection Type:

- Unannounced Inspection
- Announced Inspection

OPENING CONFERENCE

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet
- Small Business Resource Information Sheet not provided. Reason: Not a Small Business.
- Provided CBI warning to facility

The following information was obtained verbally from employees of Apex Landfill (“the Landfill”), CEC, and Montauk via remote teleconference.

Process Description:

Apex Landfill was permitted and started operations in 2005. The lateral expansion to the south of the existing unit was approved in 2017, for a total of 288.5 acres. The lateral expansion included Phase 8C and 9, which was constructed recently. 147 acres have been developed and Phase 10 started being constructed this year, for a projected total of 163 acres after planned construction this year. 21 million tons of waste are currently in place and the Landfill has about 23 years of airspace left.

The Landfill accepts 6,000 tons of waste per day and operates 24 hours 7 days per week. 85% of the waste arrives by rail from the New York and New Jersey area; 15% of the waste arrives via trucks. 60% of the received waste is MSW; 30% is construction and demolition (C&D) waste; and 14% of the waste consists of inerts, such as drill cuttings and sands. Currently, there are two active areas, each limited to half to one acre each; one of the active areas is only accepting fluff to avoid puncturing the bottom liner and the other active area is receiving C&D waste. The Landfill does not receive asbestos.

The gas collection and control system (GCCS) consists of 197 total collectors, which include clean-out risers, 158 vertical gas wells, and twelve horizontal gas wells. The renewable natural gas plant (RNG) is managed by Montauk. The RNG plant has a thermal oxidizer to treat waste gas. During RNG downtime, two flares are available to control the gas; the larger of the flares has the capacity to handle all of the gas.

Most of the odors are from the working area. The Landfill received about 300 odor complaints in 2020 and three odor complaints in 2021. The Landfill has full-time odor technicians and an odor control plan to verify odor complaints received.

Per a consent decree with Ohio EPA, the Landfill installed a temporary cover (40-millimeter geomembrane liner and wind defender) with two feet of transitional cover over 80 acres installed in 2019 and 2020. The Landfill conducts surface emissions monitoring monthly along a serpentine path that traverses at 50 feet intervals. The Landfill conducts penetration monitoring quarterly. Staff estimates an average of 5 to 10 exceedances detected during monitoring events.

The most recent well water level monitoring was conducted in 2017; there are no pumps in the gas wells. The most recent flare performance test is in 2015 when the Landfill was first subject to the NSPS. Perimeter gas probes are installed and monitored quarterly, with no exceedances found during the most recent monitoring event. The Landfill uses soil as daily and intermediate cover; no parts of the landfill has final cover.

TOUR INFORMATION

EPA Tour of the Facility: No

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Site map
2. GCCS map

CLOSING CONFERENCE

- Provided U.S. EPA point of contact to the facility

Requested documents:

- Flow rates to the RNG plant and flares (past 5 years)
- GCCS well monitoring data (in spreadsheet format), including records for correction of any exceedances (past 1 year)
- Well liquid level measurements, with percent of perforation in operation (most recent)
- Cover integrity check records (past 2 years)
- SEM reports, with all associated recorded data and documentation of correction of exceedances (past 5 years)
- Perimeter gas probes monitoring data (past 5 years)
- Submitted applications for all active air permits
- Current GCCS design plan
- Current map of the GCCS

- Most recent performance test for any control devices on site, including but not limited to flares and any gas-to-energy engines/turbines
- Semi-annual reports (4 most recent)
- Installation dates for all gas collector wells
- Waste accepted by category, in a spreadsheet format if available (past 1 year)
- Sulfur gas test reports (highest and lowest for the past 5 years)

SIGNATURES

X VICKY MEI Digitally signed by VICKY
MEI
Date: 2021.04.07
10:41:11 -05'00'

Vicky Mei
Report Author

**X CONSTANTIN
OS LOUKERIS** Digitally signed by
CONSTANTINOS LOUKERIS
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Constantinos Loukeris
Acting Section Chief