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

CAA Inspection Report

Inspection Date: February 6, 2023

Facility Name: Municipality of Arecibo Landfill

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

EPA Lead Inspector: Alex Rivera, Enforcement Officer, 787-977-5845, Rivera.Alex@epa.gov

EPA Asst. Inspector: Gloria Díaz-Galarza, Inspector In-Training, 787-977-5882, Diaz-Galarza.Gloria@epa.gov

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

This was a Clean Air Act ("CAA") compliance inspection of the Municipality of Arecibo Landfill ("MAL" or "facility"), by the United States Environmental Protection Agency ("EPA"). EPA's Alex Rivera led the inspection assisted by EPA's Gloria Díaz-Galarza. The purpose was to evaluate the facility compliance with the below listed regulatory programs.

Permitted Regulatory Program(s) Reviewed:

1. Title V operating permit PFE-TV-4953-07-1101-2475 ("TV Permit"), issued by the Department of Natural and Environmental Resources ("DNER") on June 16, 2016.
2. Modified construction permit PFE-07-0304-0336-I-II-III-C issued by DNER on November 18, 2021.
3. New Source Performance Standards (NSPS) for Municipal Solid Waste Landfills: 40 CFR, Part 60, Subpart WWW.
4. National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills – 40 CFR, Part 63, Subpart AAAA (Landfill MACT).
5. Performance Standards for Reciprocating Internal Combustion Engines (RICE) – 40 CFR, Part 63, Subpart ZZZZ.
6. Consent Decree (CD) Civil No: 3:14-cv-01438

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 CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

1. Inspection Summary

Opening Meeting

Mr. Rivera and Ms. Díaz-Galarza ("the inspectors") arrived at the facility at 10:10 AM on February 6, 2023. The on-site inspection was not announced to the facility. The lead inspector presented inspection credentials and were received by Mr. Hermes Camis, MAL Operations Manager. Mr. Camis met with the inspectors in the facility administrative building. Inspector Rivera explained that the purpose of the inspection was to evaluate compliance with the applicable CAA regulations, the CD and its TV Permit.

Mr. Rivera explained that the inspection would consist generally of a records review, a question-and-answer session, and a facility walkthrough. After concluding the opening meeting, the inspectors began with the inspection questionnaire. According to Mr. Camis, Ms. Cynthia Otero, Conwaste Environmental Compliance Division, made herself available to answer any question via phone. The following is a summary of the discussion:

Questionnaire Discussion:

Permit Status

The facility TV permit was issued by DNER on June 16, 2016, with an expiration date of June 16, 2021. According to Mr. Camis and Ms. Otero, the permit renewal application dated June 3, 2021, was received by DNER on June 7, 2021. According to Ms. Otero, DNER issued a TV Permit renewal application shield on June 3, 2022, and the renewal of the TV Permit is still pending.

Facility Ownership History

According to Mr. Camis, MAL started operations in 1973. Landfill Technologies Corp. has been operating the facility since 1992 and was previously operated before 1992 by the Municipality of Arecibo. Consolidated Waste Services LLC which is commonly known as Conwaste is the matrix company that owns Landfill Technologies Corp.

Operations

MAL currently serves the municipalities of Lares, Utuado, Quebradillas, Camuy, Isabela. Barceloneta, Arecibo, and Hatillo. It also accepts waste from private companies such as EC Waste and ARB Inc.

The facility receives domestic waste and construction/demolition debris. Mr. Camis stated that vegetative waste is not accepted, and it is deviated to the Caribbean Composting Inc. facility that is also located in Arecibo, PR. According to Mr. Camis, the facility currently receives an average of 1,100-1,200 tons/day of waste. Mr. Camis added that MAL previously received an average of 700-800 tons/day, and that landfill closures, such as the Moca Landfill closure, have caused an increase in the waste being received at the facility. Mr. Camis indicated that the facility projected useful life is 2028. Mr. Camis informed that the effect of Hurricane Maria reduced around 3 years from the landfill projected useful life. According to Mr. Camis, the facility does not have any plans to increase the landfill design capacity because it does not have more space or area to expand.

Mr. Camis informed that the facility operating hours are from 6:00 AM to 5:00 PM from Monday through Friday, and Saturdays from 7:00 AM to 12:00 PM. Mr. Camis stated that truck traffic is reduced around 4:00 PM. The facility operates most of the Holidays, except for 5 of them (Thanksgiving, Holy Friday, New Years', Three Kings, and Christmas). Mr. Camis stated that the facility weighing mechanism is operational and that it was replaced on August 11, 2022. The weighing station uses a records and operational tracking software known as TRUX[1]. The inspectors informed Mr. Camis that copies of the records generated by the TRUX software are going to be requested as part of the post-inspection process.

Mr. Camis confirmed that since the summer of 2022, the facility landfill has been generating its power using one (1) diesel fuel engine. Mr. Camis informed that the diesel fuel engine was included in the facility modified construction permit issued by DNER PFE-07-0304-0336-I-II-III-C issued by DNER on November 18, 2021, Olympian brand generator. The diesel fuel engine provides power to the landfill gas control area which include the two (2) flares, the gas collection and control system (GCCS), the workshop, and administrative building. Mr. Camis explained that the facility has two (2) landfill gas burning power generators, but were instructed by DNER not to use them until obtaining a permit. The facility has not been able to complete the necessary permitting process with DNER because the engines are not certified to burn landfill gas. The engines manufacturer and plate specifications are for burning natural gas. Since the facility only has one (1) diesel engine, the landfill gas engines are operated when maintenance is needed or under emergency scenarios.

Mr. Camis informed that the facility cover material is supplied by Agregados Furia quarry and added that around the end of January 2023, the facility started using an alternate cover material known as Posi-Shell®[2] mitigation and termination purposes. According to Mr. Camis, the Posi-Shell® is mainly a mixture of synthetic clays and portland cement, and that it provides faster drying and impermeabilization. Mr. Camis indicated that the facility obtained an approval by DNER to use Posi-Shell® as an alternate cover material in 2014. Mr. Camis also informed that the facility personnel received training on the use of the Posi-Shell®. The inspectors informed Mr. Camis that a copy of such authorization will be requested as part of the post-inspection process. Mr. Camis confirmed that currently the facility has several waste compactors or dozers: two (2) D8's, one (1) D6, and (1) D5 to compact and cover the waste. The D5 is currently being repaired and one of the D8s is being maintained.

Mr. Camis stated that the facility has one (1) water truck for particulate matter (PM) or dust suppression. The inspectors saw the water truck in operation while entering the facility premises. Mr. Camis indicated that the use of the water truck is established depending on how dry the facility grounds are. Mr. Camis informed that a monthly log is used to document the water truck operation. The inspectors informed Mr. Camis that copies of these monthly records will be requested as part of the post-inspection process.

[1] https://trux.com/ - TRUX Waste Industry Business Solutions Waste Management Software Application

[2] https://www.lscenv.com/landfill-cover-systems-pg.html - Posi-Shell®

Mr. Camis indicated that due to the facility construction date, it does not have a leachate control mechanism. Mr. Camis added that the facility does recover the GCCS condensate in a storage tank and it is used to feed by irrigation a series of vetiver grass planters.

Gas Collection and Control System

Mr. Camis confirmed that the GCCS was in operation at the time of the inspection and that the gas is being burned using one (1) of the two (2) flares. Mr. Camis further informed that the flares minimum operating temperature and efficiency were determined after conducting a series of performance tests and that the flares minimum operating temperature is 1,800^{o}F to achieve at least 98% destruction efficiency of non-methane organic compounds. The inspectors informed Mr. Camis that copies of these performance test reports will be requested as part of the post-inspection process. Mr. Camis indicated that each flare has a programmable logic controller (PLC) to manage and monitor the flares operating parameters.

According to Mr. Camis the facility GCCS has a total of 85 vertical wells, and that at the time of the inspection, only 63 vertical wells were in operation or connected to GCCS header. Mr. Camis stated that 22 vertical wells were disconnected from the GCCS header located in the south portion of the landfill since approximately 4 months and are projected to be reconnected in approximately 3 weeks from the date of the inspection. Mr. Camis added that the facility south portion vertical expansion required these 22 wells to be disconnected from the GCCS header, to allow the facility to raise all the vertical wells so that when the vertical expansion is completed, these can be reconnected to the GCCS header. Mr. Camis stated that the wells in that south portion of the landfill does not generate much methane, contrary to the north portion of the landfill on which the wells generate more methane.

Mr. Camis indicated that the facility has not submitted any GCCS design plan with revisions or changes to EPA and/or DNER. Mr. Camis stated that the facility is conducting the required monthly wells monitoring and that he conducts the methane surface monitoring every three (3) months. Mr. Camis informed that the facility also has a contract with an external company to conduct explosive gases monitoring and surface monitoring in addition to the methane surface monitoring conducted by him every three (3) months. According to Mr. Camis, all these monitoring documentation and reports are submitted to EPA as part of the required semi-annual reports and that no exceedances have been reported for both the monthly wells monitoring and methane surface emissions monitoring. Mr. Camis informed that the facility has been submitting the required startup, shutdown, or malfunction reports as part of the semi-annual compliance reports. Mr. Camis confirmed that vertical wells that are being impacted by the south portion of the landfill vertical expansion does not involves relocating any wells, it will only require raising or vertically extending the wells. The inspectors acknowledge having received the facility semi-annual reports, but informed Mr. Camis that copies of semi-annual reports or any supplemental documentation might be requested as part of the post-inspection process.

Mr. Camis informed that the facility uses a GEM^{TM} 5000[3] to monitor the GCCS vertical wells for methane, carbone dioxide, carbon monoxide, oxygen, and pressure. The monitoring equipment

[3] https://www.landtecna.com/product/gem5000-complete-package/ - GEM^{TM} 5000 series landfill monitoring instrument.

is programmed with data from all the facility monitoring wells and is calibrated daily before using it. Mr. Camis stated that the monitoring equipment manages all the data electronically and that when the operator finds an issue, it is resolved immediately, but no written report is generated documenting any corrective action. Mr. Camis mentioned that he reviews and evaluate the wells monitoring data to identify any negative parameter data trend. Inspector Rivera asked Mr. Camis to have the facility GEM™ 5000 available for monitoring some of the wells during the facility walkthrough. Mr. Camis informed that the facility GEM™ 5000 unit was sent for its annual calibration on Thursday February 2, 2023, and showed another unit that the company provided for the facility to use until the other unit its calibrated. Mr. Camis stated that he will bring the additional unit with him during the walkthrough and ask Mr. Carlos Fernández to verify if its ready to be used during the walkthrough. Mr. Camis informed that Mr. Carlos Fernández is the technician and operator in charge of the Landfill Gas Control Area.

Mr. Camis indicated that daily flare inspections are conducted by Mr. Fernández and that those are kept and available for review in the Landfill Gas Control Area control room and are also included in the annual compliance reports. The inspectors informed Mr. Camis that copies of examples of these flare daily inspections will be requested as part of the post-inspection process.

Methane Surface Emissions Monitoring

Mr. Camis informed that the facility has 301 methane surface monitoring points of 30 meters of spacing. Mr. Camis conducts the monitoring every three (3) months using a portable methane detector. According to Mr. Camis the portable methane detector is calibrated before using it using methane and oxygen gases of a known concentration. Mr. Camis indicated that conducting the methane surface emissions monitoring takes an entire day. Mr. Camis stated that he conducts the monitoring of the 301 points plus the areas near the 85 vertical wells and that he follows the areas established in the surface emissions monitoring map. However, Mr. Camis explained that currently there are areas that are not accessible due to high vegetation, but he makes his best effort to monitor as close as possible to the plotted areas and usually covers more than 301 points.

Complaints

Mr. Camis confirmed that the facility is aware of complaints being presented by representatives of the adjacent communities and informed that he communicates with the community leaders in a frequent basis. Mr. Camis stated that he is being very transparent and is committed to address any issue when humanly possible. Mr. Camis mentioned the implementation of the use of Posi-Shell® as an example of the alternative they are implementing to mitigate the issues presented by the community.

Records

The inspectors discussed the documents to be reviewed during the inspection or to be requested as part of the post-inspection process. Mr. Camis keeps and have most of the records and documents on-site and available for the inspectors to review. Mr. Camis informed that Conwaste uses Near™ data integration software to manage all equipment operational data from all their landfills. Inspector Rivera recommended Mr. Camis to develop a form, for the facility to document fugitive emission events, and includes details such as the duration, if dust passed

beyond the property boundaries, wind direction, and any actions taken during the event. The list of documents that were discussed, but are not limited, to the following:

- Design capacity report.
- Emissions inventories from 2020-2021.
- Emissions fees payments documentation from 2020-2021.
- Annual compliance certifications from 2020-2021.
- Semi-annual compliance reports. Only those not available electronically to the inspectors.
- Change of responsible official request (new Mayor). Ms. Otero informed that the TV permit renewal application included the request to change the facility responsible official.
- Copy of TV Permit renewal application.
- Monthly wells monitoring records from 2021-2022.
- Dust suppression water truck monthly records.
- Flares flow meters calibration records from 2021-2022.
- Wells monitoring equipment calibration records from 2021-2022.
- Annual fuel consumption and fuel quality reports from 2020-2021.
- GCCS design plan.
- Flares performance testing reports.
- Surface emissions monitoring design plan.
- Power generators operating hours for 2021-2022.
- TRUX software weighing mechanism records from 2022.
- Posi-Shell® alternate cover authorization letter from DNER.

2. Facility Walkthrough

The inspectors and Mr. Camis began the walkthrough at around 2:30 PM. During the walkthrough, Inspector Rivera took a series of photos. EPA's digital photo log is attached to this report (see Attachment 1). The following is a summary of the walkthrough observations:

a. Sunny weather prevailed during the inspection. At the start of the walkthrough the wind was blowing toward the west.
b. Landfill Gas Control Area
    - Mr. Carlos Fernández, Landfill Gas Control Area Operator, met the inspectors and Mr. Camis.
    - Diesel fuel power generator Olympian D100P1 (PE-542) in operation at the time of the inspection and providing power to the facility.
    - Flare CD-2 (largest capacity) in operation at the time of the inspection. Mr. Camis indicated that Flare CD-1 is seldomly used.
    - Flares gas process line has several meters to measure and monitor parameters such as temperature, pressure, and flow (digital and analog meters). Uses thermocouples for monitoring temperature.
    - The facility has one (1) blower, one (1) demister, and one (1) gas condensate tank as part of the GCCS to collect and conditioned the gases generated in the facility dump

site. The gas is either burn using flares or as fuel for two (2) landfill gas power generators.

- The facility has two (2) landfill gas power generators that were disconnected at the time of the inspection. Mr. Camis informed that the landfill gas generators are disconnected due to the issue with their construction permit application under DNER's consideration but confirmed that they do operate them when maintenance is needed to be perform to the diesel power engine or during an emergency scenario.
- The flares flow meter calibrations were done on August 16, 2021, and December 8, 2021. Mr. Camis acknowledged that flow meter calibrations shall be conducted in yearly basis and that at the time of the inspection both flow meters were due for calibration.
- Within the area control room, each flare has a PLC with a screen showing the unit operational parameters data, for monitoring and controlling its operation so they operate under the recommended operational parameters. The inspectors observed Flare CD-2 PLC screen. The flare operational temperature is set to 1,800^{o}F and the PLC temperature readings fluctuated between 1,750^{o}F to 1,830^{o}F. Mr. Camis explained that the temperature fluctuation is normal and part of the PLC programming to maintain an average operating temperature of 1,800^{o}F.
- Mr. Camis informed that the propane is used as supplemental fuel for igniting the flaring system.
- According to Mr. Camis and Mr. Fernández, the flares thermocouples are not routinely calibrated and does not have a calibration requirement. The facility uses the manufacturer recommendation to replace them once the PLC identifies a thermocouple failure. Mr. Camis showed several new thermocouples that are available in spare at the area control room.
- Mr. Fernández confirmed that he conducts the GEM^{TM} 5000 calibration using methane and oxygen calibration gases and that he calibrates the unit every day before using it and keeps a calibration log. Mr. Camis showed the calibration gases currently being used by Mr. Fernández and all methane and oxygen calibration gases cylinders had an expiration date of December 2022. Mr. Fernández informed that he requested Mr. Camis and Ms. Otero to obtain new calibration gases. Mr. Camis indicated that calibration gases were already ordered.
- Mr. Fernández confirmed that he conducts all necessary and required activities related to the Landfill Gas Control Area including those related to the GCCS, such as the vertical wells monitoring. Mr. Fernández informed that he also conducts repairs to the wells in an as needed basis. Inspector Rivera asked Mr. Fernández if he keeps a logbook to document the repair activities. Mr. Fernández stated that he does not document these activities in a logbook. Inspector Rivera suggested Mr. Fernández to consider documenting these activities.
- Mr. Fernández informed that he and another technician that works in another area of the facility are the only staff available to conduct repairs to the GCCS and the

flaring system. Mr. Fernández added that he will be working with the additional technician on the project to reconnect the 22 vertical wells to the GCCS header.

- Inspector Rivera asked Mr. Camis and Mr. Fernández to verify if the available GEM™ 5000 can be used during the dump site portion of the walkthrough. Mr. Fernández informed that the unit did not have enough battery and that needed to be calibrated and programmed to add the information related to facility wells prior to use it. Inspector Rivera agreed on proceeding with the walkthrough without the GEM™ 5000.
- Mr. Fernández showed and discussed the different documents and records that he generates as part of the flare's operation. Mr. Fernández showed an example of the flare's shutdown data sheet, which is filled every time a flare needs to be shutdown and restarted. Also showed and discussed an example of a flare inspection log and daily inspection form. Inspector Rivera informed Mr. Camis that copies of examples of these records will be requested as part of the post-inspection process.
- No visual emissions observed from the diesel engine and Flare CD-2 while conducting the walkthrough.

c. Dump Site

- Mr. Camis escorted the inspectors to the dump site portion of the facility at around 3:30 PM.
- Loose and flying debris observed in several areas of the dump site walkthrough.
- Several leachate puddles observed in at least four (4) different locations throughout the south portion of the facility perimeter road. Strong odor was present near these leachate puddles. See photo log included in Attachment 1 for more details.
- The south portion of the landfill adjacent to the south perimeter road and milk farm was observed with high vegetation. Mr. Camis informed that the vegetation helps on controlling erosion. Inspector Rivera asked Mr. Camis how surface emissions monitoring is conducted is the area. Mr. Camis explained that he tries to cover as much area as possible around its upper and lower segments.
- The facility has seven (7) GCCS sump pumps.
- Mr. Camis informed that the facility installed 20 wood posts identifying the facility north perimeter line.
- A large accumulation of plastic material was observed at the north portion perimeter road near #17 wood post. Mr. Camis stated that sometimes material can tumble down from the dump area due to the higher wind speeds at the higher parts of the facility.
- The north portion of the facility is stabilized with vegetation; no leachate leakages or puddles were observed around the north perimeter road.
- After walking the entire perimeter road, Mr. Camis and the inspectors walked towards to highest part of the facility dump site.
- Slight odor felt near well head WH-35, which according to Mr. Camis is disconnected from the GCCS header due to the south portion vertical expansion.

- Inspector Rivera asked Mr. Camis about the Posi-Shell® alternate cover material supply. Mr. Camis indicated that the material is supplied in bags by LSC company and that LSC provided training to the facility on how to prepare and apply the Posi-Shell® material.
- Strong odor felt near the higher section of the south portion of the landfill. Mr. Camis confirmed that the area where the odor was felt is part of the section of the landfill on which the vertical wells are disconnected from the GCCS header.
- Mr. Camis informed that in 2022 the facility completed a similar vertical expansion project at the north portion of the dump site. To complete that project, around 20-25 vertical wells were disconnected from the north slope GCCS header. According to Mr. Camis the project started around the beginning of 2022.
- Around 4:27 PM, the wind was still blowing towards the west. Higher wind speeds were noticed at the upper and highest areas of the facility dump site.
- Mr. Camis confirmed that the east portion of the facility dump site has not been impacted by vertical expansions.
- Inspector Rivera asked Mr. Camis about the landfill fees. Mr. Camis stated that the landfill charges $33 per ton of waste.
- Mr. Camis emphasized that he is in constant communication with community leaders and that the facility tries to address as many issues as possible. As an example, Mr. Camis mentioned that they have installed concrete barriers to restrict the entrance of vehicles into the dump site outside of the facility operating hours and that are in the process of reestablish the use of a controlled access gate to access the facility dump site. Mr. Camis also mentioned that during Hurricane Fiona they tried to obtain enough cover material to operate, but the interruption of operation of Agregados Furia quarry disrupted the availability of cover material during the days after the hurricane.
- No fugitive dust was observed beyond the property fenceline during the walkthrough.

At approximately 4:45 PM, the inspectors completed the walkthrough and were escorted by Mr. Camis to the facility administrative building.

3. Closing Meeting

At approximately 4:50 PM, the inspectors returned to the conference room for a closing conference. During the closing conference, the inspectors informed Mr. Camis that an inspection report summarizing the observations and discussions from the site visit will be shared with him and Ms. Otero. Also Mr. Camis was informed that a communication will be sent requesting the records and information needed to complete the post-inspection process. The following is a summary of the additional topics discussed during the closing meeting:

- Mr. Camis informed that the facility will be working on reconnecting the 22 vertical wells disconnected from the GCCS header as soon as possible and that all materials to complete the reconnection are available on-site.

- Mr. Camis acknowledged the value of the use of a form to document visual observations during fugitive dust emitting events and having a logbook for the operator to document relevant activities at the Landfill Gas Control Area.

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.

Inspection Report Sign-Off

Lead Inspector's Name: Alex Rivera

ALEX RIVERA

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Date: 2023.02.16 14:35:01 -04'00'

Assisting Inspector's Name: Gloria Díaz-Galarza

GLORIA DIAZ-GALARZA

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Date: 2023.02.16 14:43:10 -04'00'

Supervisor's Name: Nancy Rodríguez

NANCY RODRIGUEZ

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Date: 2023.02.16 15:28:12 -04'00'

Municipality of Arecibo Landfill
EPA February 6, 2023 Clean Air Act Inspection Photo Log

Date	General Location	Description	Photo ID	Time	Comments
2/6/2023	Landfill Gas Control Area	Partial view of diesel fueled Olympian (PE-542) Model DP100P1 power generator.	IMG_3483	2:34 PM	The engine was in operation at the time of the inspection. Included in Construction Permit Modification PFE-07-0304-0336-I-II-III-C issued by DNER on November 18, 2021.
2/6/2023	Landfill Gas Control Area	View of condensate storage tank discharge 001.	IMG_3484	2:35 PM	
2/6/2023	Landfill Gas Control Area	View of flares CD-1 (flare A) and CD-2 (flare B) facing north.	IMG_3485	2:35 PM	Flare B (larger capacity) was in operation at the time of the inspection.
2/6/2023	Landfill Gas Control Area	View of landfill gas collection system blower and demister facing south.	IMG_3486	2:36 PM	
2/6/2023	Landfill Gas Control Area	View of flare CD-2 or flare B specifications plate.	IMG_3487	2:44 PM	Flares specifications plates accurate with the descriptions included in the facility Title V permit PFE-TV-4953-07-1101-2475 issued on June 16, 2016.
2/6/2023	Landfill Gas Control Area	View of landfill gas power generators facing east.	IMG_3488	3:22 PM	The landfill gas power generators were not in operation at the time of the inspection.
2/6/2023	Landfill Gas Control Area	View of landfill gas power generators facing southeast.	IMG_3489	3:22 PM	The landfill gas power generators were not in operation at the time of the inspection.
2/6/2023	Dump Site (South Portion) and Perimeter Road	Partial view of the facility dump site south portion and its perimeter road facing east.	IMG_3490	3:28 PM	
2/6/2023	Dump Site (South Portion)	Partial view of the facility dump site south portion and gas collection and control system (GCCS) header facing northeast.	IMG_3491	3:31 PM	A total of 22 GCCS vertical wells were disconnected from the south portion of the GCCS header at the time of the inspection.

Municipality of Arecibo Landfill
EPA February 6, 2023 Clean Air Act Inspection Photo Log

2/6/2023	Dump Site (South Portion)	Partial view of the facility dump site south portion and gas collection and control system (GCCS) header facing north.	IMG_3492	3:31 PM	The south portion GCCS header was capped at the time of the inspection.
2/6/2023	South Perimeter Road	Partial view of a mesh located at the south perimeter road.	IMG_3493	3:32 PM	Pieces of components and materials used for the GCCS were also observed on the ground.
2/6/2023	South Perimeter Road	Leakage puddle observed in the south perimeter road facing northeast.	IMG_3494	3:33 PM	Strong odor near the leakage puddle.
2/6/2023	South Perimeter Road	Google Maps® screenshot showing approximate location of the leakage puddle shown in IMG_3494.	IMG_3495	3:34 PM	
2/6/2023	South Perimeter Road	Additional leakage puddle observed in the south perimeter road facing north.	IMG_3496	3:36 PM	Strong odor near the leakage breakout.
2/6/2023	South Perimeter Road	Additional leakage puddle observed in the south perimeter road facing east.	IMG_3497	3:40 PM	Strong odor near the leakage breakout.
2/6/2023	South Perimeter Road	Smaller leakage puddle observed in the south perimeter road facing east near the one shown in IMG_3497.	IMG_3498	3:41 PM	Strong odor near the leakage breakout.
2/6/2023	South Perimeter Road	Google Maps® screenshot showing approximate location of the leakage puddle shown in IMG_3497 and IMG_3498.	IMG_3499	3:42 PM	
2/6/2023	South Perimeter Road	Google Maps® screenshot showing approximate location of the leakage puddle shown in IMG_3497 and IMG_3498.	IMG_3500	3:42 PM	
2/6/2023	North Perimeter Road	Large accumulation of plastic bags and other plastic materials observed near the perimeter line post #17.	IMG_3501	3:57 PM	

Municipality of Arecibo Landfill
EPA February 6, 2023 Clean Air Act Inspection Photo Log

2/6/2023	Dump Site	Partial view of GCCS well-head #35 facing southeast.	IMG_3502	4:13 PM	
2/6/2023	Dump Site	Partial view of the south portion of the dump site facing southeast.	IMG_3503	4:19 PM	
2/6/2023	Dump Site	Partial view of the south portion of the dump site facing southwest.	IMG_3504	4:19 PM	
2/6/2023	Dump Site	Partial view of the south portion of the dump site facing south.	IMG_3505	4:20 PM	
2/6/2023	Dump Site	Partial view of the south portion of the dump site facing southeast.	IMG_3506	4:22 PM	Also shows one of the disconnected GCCS vertical wells.
2/6/2023	Dump Site	Partial view of the north portion of the dump site facing northeast.	IMG_3507	4:22 PM	
2/6/2023	Dump Site	Partial view of the north portion of the dump site facing north.	IMG_3508	4:22 PM	
2/6/2023	Dump Site	Partial view of the south portion of the dump site facing west.	IMG_3509	4:28 PM	Also shows one of the disconnected GCCS vertical wells.
2/6/2023	Dump Site	Partial view from the highest elevation point of the facility facing east.	IMG_3510	4:28 PM	
2/6/2023	Dump Site	Partial view from the highest elevation point of the facility facing north to the Caño Tiburones Natural Reserve.	IMG_3511	4:28 PM	


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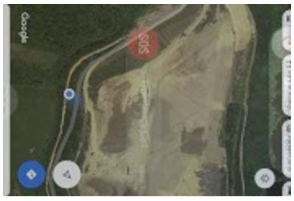
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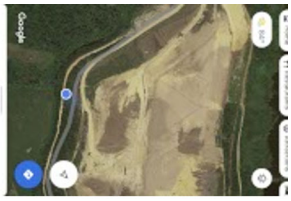
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