



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Republic Services Livingston Landfill, Pontiac, IL

FROM: Giles Chickering, Physical Scientist
AECAB (MI/WI)

Jacob Herbers, Environmental Engineer
AECAB (MI/WI)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Livingston Landfill

Facility Location: 14206 East 2100 North Road Pontiac, Illinois 61764

Date of Inspection: 05/22/2025

EPA Inspector(s):

1. Giles Chickering, Physical Scientist
2. Jacob Herbers, Environmental Engineer
3. Aileen Drum, Physical Scientist
4. DeMarkus Hodge, Environmental Engineer
5. Sasa Dunovic, Environmental Engineer
6. Ethan Chatfield, Environmental Engineer

Other Attendees:

1. Julie Paramo, Operations Manager, Republic
2. Todd Craddock, Operations Supervisor, Republic
3. Eric Dippon, Environmental Manager, Republic
4. Matt Nimbler, Environmental Systems Manager, Republic
5. Paxton Richards, Environmental Specialist, Republic

Facility Name: Livingston Landfill
Facility Location: 14206 East 2100 North Road Pontiac, Illinois 61764
Date of Inspection: May 22, 2025

6. Caleb Painter, Gas Technician, Republic
7. Zach Woodburn, GM for landfill, Republic
8. Megan Crowley, Area Environmental Manager, Republic
9. Niki Westenberg, Sr Manager of Air Program, Republic
10. Sarah Brown, Air Consultant, Weaver Consultants
11. Rachelle Maxheimer, Air Consultant, Weaver Consultants

Contact Email Addresses: edippon@republicservices.com; japarano@republicservices.com; tcradduck@republicservices.com.

Purpose of Inspection: Clean Air Act Inspection

Facility Type: Municipal solid waste (MSW) Landfill

Regulations Central to Inspection: 40 C.F.R. Part 60, Subpart XXX, 40 C.F.R. Part 63, Subpart AAAA, and Livingston's CAAPP permit (I.D. No.: 105821AAO, Permit No.: 97030075).

Arrival Time: 9:50 CDT

Departure Time: 15:20 CDT

Inspection Type:

- ☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

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

Was any information collected during the inspection claimed as CBI?

☐ Yes ☒ No.

The following information was obtained verbally from Livingston Landfill staff, unless otherwise noted.

Process Description:

Livingston Landfill accepts MSW, as well as construction and demolition (C&D) debris, asbestos, and other Illinois classified special wastes that are comingled in the same points of disposal. The Landfill consists of two main hills; a southern hill that is fully under final cover, and a northern hill that actively accepts waste. The southern hill was permitted in 1978 and started accepting waste in the late 1970s or early 1980s. Older portions (eastern portion of the south hill) are unlined. The northern hill has

about 20 more years of capacity to accept waste. The Landfill receives about 4,000 tons per day. The landfill uses tarps in lieu of soil for of daily cover.

Livingston Landfill has two enclosed flares (6,000 scfm each) and one candlestick flare (2,068 scfm) on site. A gas-to-energy plant with three turbines (approximately 2,000 scfm each) converts landfill gas to energy. The gas plant is owned by Hoosier Energy and operated by Ameresco under a contract with Republic Services. The goal is to operate the gas-to-energy plants at full capacity, but flares are also run to maintain the vacuum set point of the well field. The gas-to-energy plant has been operating for approximately 10 years. It was previously shut off for 10 years prior to reopening (approximately 2005-2015), but was operational before that 10-year period of dormancy (before 2005) for an unspecified amount of time.

Staff Interview: Livingston Landfill accepts waste 5:30 AM to 3:00 PM Monday through Friday and 5:30 AM to 10:00 AM on Saturdays. The Landfill has approximately 26 employees, plus consultants and contractors on site. Republic Services employs two gas technicians that are on site and tuning/maintaining the well field most days of the week. Civil and Environmental Consultants perform surface emission monitoring (SEM) at the landfill quarterly. SEM is conducted by doing simultaneous serpentine path and penetration monitoring events. Monthly cover integrity checks are performed and recorded electronically. No significant issues were reported for cover integrity during the opening conference. Cover integrity repairs were described to be repaired within one to two days.

Livingston Landfill works to maintain the vacuum set point of 41 inches of water column in the well field consistently. The site used to have some HOV wells and they may still be in place. Alternative operating conditions may include seven or eight leachate clean out risers. Livingston landfill has boundary probes for monitoring with no known issues.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

The EPA inspectors conducted SEM on the north hill, and parts of the south hill of the Landfill. The EPA discovered 20 SEM hits above 500 ppm, listed in Appendix B. Photos corresponding to most of the EPA SEM hits are listed in the table in Appendix A. Additional photos document examples of surface integrity issues, including erosion and leachate seeps on the surface of the Landfill.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were taken during this inspection and are listed in Appendix B.

CLOSING CONFERENCE

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

Requested documents:

- A copy of the most recent Design Plan for Livingston. If the SEM pathway is separate from the design plan, please send that as well
- Semi-annual reports since January 1, 2022 to present
- Manufacturer's specifications for all controls and initial performance test report(s), including supplemental information required in 40 CFR § 63.1981(i).
- Continuous flow records to control devices (15-min intervals) (40 CFR § 63.1983(c)(2)). if there's multiple control devices, provide both the individual flows to each control, and the total flow. Please provide this information from January 1, 2022 to present.
- Up-to-date plot map showing which areas are under final, intermediate, and daily cover, and showing each existing and planned gas collection device and gas probe with a unique identification label and the installation date for each.
- A table with gas collection device (well, probe) numbers and dates of installation can be substituted for labeling these items on the map
- Monthly wellhead monitoring records for parameters measured per 40 CFR § 63.1961(a)(1) through (6), including records of all collection and control system exceedances of the operational standards (40 CFR § 63.1983(e)(1)), along with any related root cause analyses and corrective action analyses. (40 CFR § 63.1983(e)(1)(3) – (5)). Please provide this information from January 1, 2022 to present in Excel/spreadsheet format.
- Quarterly records of liquid levels in wells from January 1, 2022 to present.
- Monthly cover integrity reports January 1, 2022 to present.
- A list/table of any HOVs or other alternative operating conditions currently in place at the Landfill.

Concerns: SEM exceedances listed in the table in Appendix B, especially the exposed flexible pipe venting gas (Hit #15).

DIGITAL SIGNATURES

JACOB
HERBERS

Digitally signed by JACOB HERBERS
Date: 2025.07.09 16:59:21 -05'00'

Date: 2025.07.09 16:59:21 -05'00

NATHAN
FRANK

Digitally signed by

NATHAN FRANK

Date: 2025.07.14
10:52:03 -05'00'

APPENDIX A: DIGITAL IMAGE AND VIDEO LOG

Inspector Name: Giles Chickering and Jacob Herbers

Archival Record Location: EPA Electronic Records

Image #	File Name	Date & Time	Image Description
1	G-P5220073.JPG	5/22/2025 12:43	Hit near well 181A, exposed fabric
2	G-P5220074.JPG	5/22/2025 12:43	Hit near well 181A, exposed fabric
3	G-P5220075.JPG	5/22/2025 12:51	Hit near well 173A
4	G-P5220076.JPG	5/22/2025 12:51	Hit near well 173A
5	G-P5220077.JPG	5/22/2025 13:08	Hit near well 175A
6	G-P5220078.JPG	5/22/2025 13:34	Hit on cover integrity near well 2B
7	G-P5220079.JPG	5/22/2025 13:41	Leachate coming through surface
8	G-P5220080.JPG	5/22/2025 13:47	Hit near well 234B, below leachate puddle
9	G-P5220081.JPG	5/22/2025 13:50	Hit at well 234B
10	P5220069.JPG	5/22/2025 10:22	IRwin probe distance check
11	P5220070.JPG	5/22/2025 11:09	West slope
12	P5220071.JPG	5/22/2025 11:09	North slope
13	P5220072.JPG	5/22/2025 11:20	Well 241, surrounding distressed vegetation
14	P5220073.JPG	5/22/2025 11:23	Erosion by well 250
15	P5220074.JPG	5/22/2025 11:24	Erosion by well 250
16	P5220075.JPG	5/22/2025 11:30	Well 251
17	P5220076.JPG	5/22/2025 11:34	Well 252
18	P5220077.JPG	5/22/2025 11:35	Gully on NW slope
19	P5220078.JPG	5/22/2025 11:40	Exposed trash on NW slope
20	P5220079.JPG	5/22/2025 11:53	North slope, tracks in soil
21	P5220080.JPG	5/22/2025 11:59	Well 256
22	P5220081.JPG	5/22/2025 12:06	Well 6 A
23	P5220082.JPG	5/22/2025 12:17	North slope erosion near well 204
24	P5220083.JPG	5/22/2025 12:24	Well 200
25	P5220084.JPG	5/22/2025 12:31	Exposed flexipipe
26	P5220085.JPG	5/22/2025 12:35	North slope erosion
27	P5220086.JPG	5/22/2025 12:52	Well 3C
28	P5220087.JPG	5/22/2025 12:56	Well 5B
29	P5220088.JPG	5/22/2025 12:59	Well 246, standing water
30	P5220089.JPG	5/22/2025 13:03	Well 245A, standing water
31	P5220090.JPG	5/22/2025 13:18	Erosion rills and cracks on West slope
32	P5220091.JPG	5/22/2025 13:36	Excavator and road near hit
33	P5220092.JPG	5/22/2025 13:44	Excavator and road near hit

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Video #	File Name	Date and Time	Video Description
1	FLIR0461.mp4	5/22/2025 15:11	Gas-to-energy turbine exhausts from the North
2	FLIR0462.mp4	5/22/2025 15:40	Turbine exhausts and flare from the south
3	FLIR0463.mp4	5/22/2025 15:45	Turbine exhausts and flare from the south
4	FLIR0464.mp4	5/22/2025 15:50	Gas-to-energy turbine exhausts from the North

APPENDIX B: FIELD MEASUREMENT DATA

Instrument Information

Instrument	EPA Inspector
Inficon IRwin #1 (S/N: 92004352)	Aileen Drum
Inficon IRwin #2 (S/N: 92004350)	DeMarkus Hodge
Inficon IRwin #3 (S/N: 92005974)	Ethan Chatfield
Inficon IRwin #4 (S/N: 92005482)	Sasa Dunovic

Calibration Gas Information

Cal Gas Composition	Lot/Serial Number	Expiration Date
Air, zero grade	3-116-85	5/20/2027
Methane, 523 ppm	304-403101558-1	7/24/2028

IRwin #1 Calibration Check @ 10:39 CDT

Cal Gas Level (ppm)	IRwin Reading		
	Run 1	Run 2	Run 3
0	0	0	0
523	515	516	514

IRwin #2 Calibration Check @ 10:38 CDT

Cal Gas Level (ppm)	IRwin Reading		
	Run 1	Run 2	Run 3
0	0	0	0
523	514	515	514

IRwin #3 Calibration Check @ 10:39 CDT

Cal Gas Level (ppm)	IRwin Reading		
	Run 1	Run 2	Run 3
0	0	0	0
523	515	516	516

IRwin #4 Calibration Check @ 10:37 CDT

Cal Gas Level (ppm)	IRwin Reading		
	Run 1	Run 2	Run 3
0	0	0	0
523	523	521	520

Upwind and Downwind Readings

Upwind reading (ppm methane)	0
Downwind reading (ppm methane)	0

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EPA SEM Hit #	Reading (ppm CH ₄)	Confirmation Reading (ppm CH ₄)	Latitude	Longitude	Description
1	855	758	40.9345	-88.6524	Hit near well 181A, exposed fabric
2	827	885	40.93449	-88.6534	Hit near well 173A
3	1628	1094	40.93415	-88.6548	Hit near well 175A
4	752	1066	40.93403	-88.6563	Hit on cover integrity near well 2B
5	738	934	40.93423	-88.6578	Hit near well 234B, below leachate puddle
6	559	590	40.93425	-88.6582	Hit at well 234B
7	1422	985	40.93491	-88.6606	Hit near well 241
8	8194	2218	40.93547	-88.6613	Hit near well 251
9	1120	1057	40.93601	-88.6613	Hit near well 252
10	2473	1594	40.93614	-88.6588	Hit near well 255
11	880	734	40.93615	-88.6581	Hit near well 256
12	822	1513	40.93592	-88.6567	Hit near well 6A
13	627	542	40.9361	-88.6548	Hit near well 204
14	643	912	40.9355	-88.6543	Hit near well 200
15	67880	18723	40.93555	-88.6524	Exposed flexipipe
16	825	1000	40.93454	-88.6565	Hit near well 3C
17	1164	897	40.93541	-88.6565	Hit near well 5B
18	587	514	40.9349	-88.6573	Hit near well 245A
19	506	596	40.9354	-88.66	Hit on erosion rills
20	1302	1224	40.93292	-88.6617	Hit on road near excavator