



February 9, 2024

Michele Kharroubi, P.E.
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Division of Air Resources
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VIA EMAIL: Michele.Kharroubi@dec.ny.gov

**RE: Ontario County Landfill – DECID #8-3244-00004
Veneer Failure Corrective Actions**

Dear Ms. Kharroubi,

This letter serves as an update on the corrective actions taken since our previous communication, sent by Barton and Loguidice on December 7, 2023, and outlines a timeline for addressing outstanding issues.

As you are aware, during the 4th quarter SEM event on November 15th, initial methane exceedances were detected at the surface penetration for gas extraction wells EW-2023-1 (SEM point 179) and EW-2023-2 (SEM point 180). These SEM locations were unable to be re-monitored as required during the first and second ten day rechecks due to safety concerns related to potential unstable slope conditions caused by the veneer failure. Subsequently, once safety concerns were mitigated, the two exceedance locations were re-monitored constituting the required 30-day rechecks. During the 30-day recheck, which took place on December 13th, location 179 remained above the 500-ppm exceedance threshold, and location 180 was below the exceedance threshold.

It should be noted that both gas extraction wells listed above remain non-compliant for well head operating pressure, because the lateral providing vacuum was disconnected after the veneer failure occurred on November 15th and has not yet been restored. In accordance with 40 CFR 63 Subpart AAAA 63.1963(a)(3)(C) "*If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the owner or operator must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 63.1981(j)*", root cause and corrective analyses were performed and an implementation schedule was developed and will be submitted separately in the forthcoming week.. A new lateral could not be installed until authorization from the forensic investigation team was received as to not disturb the investigation process. Casella has retained McMahon & Mann to assist with the investigation. At this time, all investigative sampling has been completed. As of February 5th, Casella received approval from McMahon & Mann to proceed with installing a new lateral.

Several additional vertical gas extraction wells, wells EW-2023-1, 2, 3, 4, 5 and 6, were also impacted by the veneer failure and could not be accessed for wellhead monitoring due to safety concerns during the month following the event. We are pleased to report the area is now accessible, and normal monitoring resumed at all wells on December 13th.

As specified in the January 2023 Semi-Annual Monitoring Report, five SEM locations from the 4th quarter 2023 SEM event exhibited methane concentrations above 500-ppm threshold three times and could not be corrected within the 30-day corrective action period. In accordance with 40 CFR 63 Subpart AAAAA 63.1960(c)(4)(v), *“For any location where monitored methane concentration equals or exceeds 500 ppm above background three times within a quarterly period, a new well or other collection device must be installed within 120 days of the initial exceedance”*, new gas extraction wells, EW-2023-30, 31, 32, 33, 34, 35, and 36, were installed immediately upslope of the veneer failure and closure area on December 8, 2023 as a corrective action to address the exceedances at SEM points 170, 172, and 179. A separate communication will be sent to address the additional SEM exceedance points located outside the area that experienced the veneer failure (points 201 and 254).

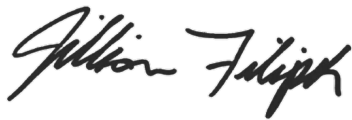
Dewatering pumps are pending installation at extraction wells EW-2023-7, 8, and 9, as the force main they would discharge into was removed resulting from the veneer failure. The replacement of the force main is expected to conclude by mid-May, barring any unforeseen extreme weather events.

In the weeks following the veneer failure, the remaining soil was carefully stripped down to the liner layer of the cap. Additionally, the stormwater swales at the base of the slope underwent reconstruction to ensure proper diversion of stormwater from the slope to the designated stormwater ponds. Comprehensive plans are being developed to address the impact, involving the repair of the torn liner and the installation of a new vacuum lateral, a new force main, and enhanced stormwater management infrastructure in the affected area. Barring any unforeseen extreme weather events, we anticipate the completion of liner and gas infrastructure repairs by mid-May. The enhancement of stormwater infrastructure will follow the completion of the liner repairs.

If you have any questions or if you would like additional information, please contact me or the General Manager Mr. Brian Sanders at your convenience.

Sincerely,

CASELLA WASTE SERVICES OF ONTARIO, LLC



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Environmental Analyst

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