Landfill Gas Generation Study Lockwood Ash Disposal Site

Lockwood Hills LLC Dresden, New York

June 2021

Prepared by



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Prepared by EnSol, Inc. 661 Main Street Niagara Falls, New York 14301

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1. Introduction

Lockwood Hills LLC (Lockwood Hills) manages the Lockwood Ash Disposal Site (Lockwood or the Facility), an ash monofill located in the Town of Torrey, Yates County, New York on Swarthout Road. The Facility is bounded by Swarthout Road to the east, and by Feagle Road to the south. Lockwood Hills maintains a 6 NYCRR Part 360 Series Solid Waste Management Facility permit (Permit No. 8-5736-00005/00003-0) for the Facility. The permit issued by the New York State Department of Environmental Conservation (NYSDEC) allows Lockwood to accept fly ash, bottom ash, pulverizer mill rejects and wastewater treatment plant sludge from several specifically named power generation facilities including the Greenidge Power Generating Station.

In a Notice of Incomplete Application dated March 3, 2020 the New York State Department of Environmental Conservation (NYSDEC) requested that a gas generation study be performed at Lockwood to determine the gas generation rate from the waste mass and the composition of this landfill gas. Their objective for this study is to determine the need for landfill gas management in the closure design at Lockwood. In response to this request, Lockwood developed a soil gas sampling protocol to determine the composition of gas generated from the landfill and the associated gas generation rate (Attachment 1). This report presents the results of the soil gas sampling, as well as a literature review of gas generation in landfills with similar waste composition.

2. Literature Review

A literature review regarding the potential for gas generation in a coal ash monofill was conducted to review other documented cases of landfill gas generation in landfills with a similar waste composition to Lockwood. No peer-reviewed articles were found documenting this specific phenomenon. A document sponsored by the U.S. Department of Energy (Elcock & Ranek, 2006) states that multiple cases were identified where variances were granted because landfill gas management was not appropriate or necessary for a disposal unit that manages coal combustion wastes. Similarly, the U.S. Environmental Protection Agency's (U.S. EPA's) Landfill Gas Emissions Model (LandGEM) Version 3.02 User's Guide (Alexander et al., 2005) states that "non-biodegradable waste (i.e. inert material), such as ash from waste combustion may be subtracted from the Waste Design Capacity, depending on documentation and approval from a regulatory authority." indicating that the U.S. EPA does not anticipate ash to be a meaningful source of landfill gas. Reference citations may be found in Appendix 4.

An article provided by the NYSDEC (Musselman et al., 2000) indicates the potential for hydrogen gas (H₂), methane (CH₄), hydrogen sulfide (H₂S), and non-methanogenic organic compounds (NMOCs) from ash monofills. The subject landfill in this paper is a municipal waste combustor ash monofill, rather than a coal ash monofill, and is therefore not directly applicable to Lockwood. Furthermore, the authors note that results from a comprehensive ash sampling and analysis program showed that there was incomplete combustion of the waste with moderate to high percent Loss on Ignition averaging 6.4%. This indicates that the landfill had a considerable amount of biodegradable content. Ash samples from Lockwood also had a relatively high Loss on Ignition, but unburned coal is not biodegradable. However, some insights from this paper indicate that minor gas generation potential may exist at the LADS.

Musselman et al. describe how oxidation reduction reactions of elemental metals (e.g., aluminum or iron) may generate hydrogen gas. Their discussion focuses largely on aluminum, which reacts with water to form H₂ and, depending on conditions, aluminum oxide (Al₂O₃), boehmite (AlOOH), or aluminum hydroxide (Al(OH)₃). An oxide layer protects elemental aluminum from corrosive reactions with water, but this layer can be disrupted by factors such as pH lower than 4 or higher than 9 and the presence of chloride ions. A pH below 4 or greater than 9 has never been observed in Lockwood leachate. Chloride has been detected in Lockwood leachate samples throughout the history of sampling for this parameter (2003 – 2020), so there is potential for chloride ions to disrupt the oxide layer, allowing for corrosive H₂ forming reactions between Al and H₂O to take place.

Musselman et al. also list chromium, copper, iron, and zinc as other elemental metals that, through oxidation reduction reactions can produce H_2 gas. Iron and copper have been shown to have H_2 generation potential at pH 13.5, but not between pH 9.3 and 11.4 (Magel as cited in Arm and Lindeberg, 2006). The reported pH value of 13.5 is higher than any reported in the landfill leachate, so copper and iron are unlikely to be part of a reaction that will produce H_2 gas at Lockwood. Another study showed that of mixtures with aluminum, lead, magnesium, and zinc placed in NaOH solution, only the ash-aluminum mixture generated H_2 gas (Péra et al. as cited in Arm and Lindeberg, 2006).

Not only are current or historic conditions within the landfill not conducive for H_2 gas production, elemental metals available within the waste to support such reactions are low, as suggested by the low levels of these metals in landfill leachate. Chromium has not been detected in landfill leachate since September of 2011 and historic fly ash samples indicate low concentrations of this metal. In 2005, chromium was found in fly

ash samples at 0.026 mg/L, while in 2007 it was below the detection limit of 0.01 mg/L. Copper and zinc are both found periodically in leachate samples but are typically at concentrations below 20 μ g/L. Iron is found in much larger concentrations than any of these other metals ranging from less than 0.01 mg/L to over 100 mg/L. Reduced concentrations of aluminum in recent leachate samples (post-2011) at most leachate sampling locations relative to historic conditions, indicate a reduced potential for H₂ generation from oxidation reduction reactions involving aluminum. It should be noted that the study by Arm and Lindeberg states that it is the content of elemental aluminum, not total aluminum that influences the amount of H₂ generation. Musselman et al. (2000) also state that it is the oxidation of elemental aluminum, zinc, chromium, iron, copper, and other elemental metals under the right environmental conditions that contribute to H₂ generation.

Musselman et al. also noted a small amount of CH_4 , generation, likely from a low-level of methanogenic bacterial activity, production of H_2S , which was likely the result of microbial activity in the landmass, and low concentrations of NMOCs. Due to the presence of organic matter disposed of in the landfill following the disposal of dredged pond sediment and associated vegetation there is a limited potential for a small amount of CH_4 , H_2S , and NMOCs to be generated where this material was landfilled as organic matter present decomposes. Methane, H_2S , and NMOC production is not anticipated in other areas of the landfill because these compounds are produced through the bacterial degradation of organic matter. Further, it is unlikely that bacterial populations, including sulfate-reducing bacteria, will be present in CCR waste outside of the area where organic matter was landfilled because bacteria need organic matter to sustain their metabolism and growth (Muyzer & Stams, 2008).

Carbon monoxide was also included in the list of parameters for the Lockwood gas generation study, however, it is unlikely that CO will be a substantial component of any gas detected. This gas is typically found at levels between 0 and 3% by volume in municipal solid waste landfill gas, with normal levels being around 0.001% by volume (Gendebien et al. as cited in Fischer et al. 1999), with higher values indicating possible combustion in the waste mass. Similarly, the U.S. EPA's Fifth Edition of Compilation of Air Pollutant Emissions Factors, Volume 1: Stationary Point and Area Sources (2008) states that CO is not a typical component of landfill gas but is associated with underground combustion of the waste mass. No fires have ever been reported at Lockwood, nor are any expected to occur based on the type of waste landfilled, so the potential for significant quantities of CO in the soil gas samples is low.

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3. Soil Gas Sampling Results

Soil gas sampling was conducted by EnSol, Inc. on June 15, 2021, in general accordance with the NYSDEC reviewed Gas Generation Soil Gas Sampling Protocol. This protocol was revised slightly during June of 2021 based on the availability of rental equipment and a change to the method for measuring velocity. This revised protocol was sent to the NYSDEC on June 10, 2021. No additional comments from the NYSDEC were received.

On the date of sampling, there was light rain in the early morning, which subsided around 9:15 am. After this time, the weather conditions were overcast with slight wind and temperatures ranging from approximately 64 to $82 \,^{\circ}$ F.

The soil gas sampling results were recorded on a field data form and have been included with this report as Attachment 2. Representative photographs from the sampling event are included in Attachment 3. Samples were taken at seven points throughout the site, including an initial upwind point (UW1), initial downwind point (DW1), four landfill waste points (LW1 through LW4), and a final downwind point (DW2). Upwind and downwind ambient air sampling locations were chosen based on the wind direction observed at the time of sampling. The actual locations of all seven sampling points are identified in Figure 1.

Three measurements were taken at each of the landfill waste points; one ambient air measurement, one measurement directly after sampling tools were lowered into the borehole and clay was used to seal the opening, and one following purging two borehole volumes of air (4.69 liters) from the borehole. Point LW1 was taken in the Original Ash Disposal Site (OADS), LW2 was taken in the overfill liner area, LW3 was taken in Stage II, and LW4 was taken in Stage I within the 2019 confined disposal area where ash contaminated sediment associated with upgrades to the Treatment Pond were disposed.

Cover and waste composition are described on the field data form and generally reflect what was expected at each location. Sample point LW1 had approximately two feet of final cover soils underlain by grey fly ash. Sample point LW2 had approximately 2.25 feet of intermediate cover soils underlain by grey fly ash. At about five feet deep the ash in LW2 became wet for an inch or so, before becoming drier again at the bottom of the borehole. Sample point LW3 had approximately 1.1 feet of intermediate cover soils underlain by ash contaminated soils with much higher clay content than waste observed at any other sample points. This is presumed to be from deposition of the clay liner removed from the Treatment Pond prior to installation of the new geosynthetic membrane liner system.

Cover soils were dry at all locations, despite rain earlier in the day. The waste at sample point LW4 seemed to retain some moisture, likely due to its higher clay content, but was not saturated. Recognizable organic matter (e.g., roots) were only visible in the first few inches of cover soils, associated with grasses, clovers, and other species growing atop the landfill.

The results from the testing are presented in Table 1. There are a few observations that should be mentioned. First, all gases were observed at levels well below their lower explosive limit. Second, static and differential pressure measurements were recorded but are not accurate because the required pitot tube fitting was not provided with the rental equipment. The static and differential pressure readings are, therefore, excluded from further discussion.

	Parameter	CH ₄	CO ₂	O 2	Balance	СО	H ₂ S	H_2	Temp	Velocity
	Units	%	%	%	%	ppm	ррт	%	° F	mph/fpm**
Lo	cation									
UW1		0.2	0.1	21.2	78.6	1	0	< 0.01	64.3	9
DW1		0.2	0.2	21.1	78.7	1	0	< 0.01	65.6	9
DW2		0.2	0	21.1	78.7	1	0	< 0.01	82	7
LW1	Ambient	0.2	0.1	21.2	78.5	1	0	< 0.01	67.7	7
	Initial	0.2	1.4	19.5	78.5	11	0	< 0.001	66.1*	-
	After Purge	0.1	0.7	20.5	78.6	1	0	< 0.01	66.3*	1.2 (0 - 2.4)
LW2	Ambient	0.2	0.1	21.4	78.4	1	0	< 0.001	66.8	12
	Initial	0.2	0.9	20.9	78.1	7	0	< 0.01	66.8*	-
	After Purge	0.1	0.8	20.8	78.3	2	0	< 0.001	59.6	2.7 (0 - 5.4)
LW3	Ambient	0.2	0.1	21.4	78.4	0	0	< 0.01	67.3	12
	Initial	0.2	0.4	18	81.4	13	0	< 0.01	59.7	-
	After Purge	0.2	0.5	18.6	80.8	1	0	< 0.001	57.2	2.95 (0 - 5.9)
LW4	Ambient	0.2	0.1	21.2	78.6	1	0	< 0.001	79.2	8
	Initial	0.2	1	20.2	78.6	4	0	< 0.01	78	-
	After Purge	0.1	0.8	20.2	78.9	2	0	< 0.001	80.9	5.2
A	Avg. Ambient	0.2	0.1	21.2	78.6	0.9	0		70.4	9.1
Av	g. Initial LW	0.2	0.9	19.7	79.2	8.8	0		67.7	-
Avg. Aft	er Purge LW	0.1	0.7	20.0	79.2	1.5	0		66.0	3.0

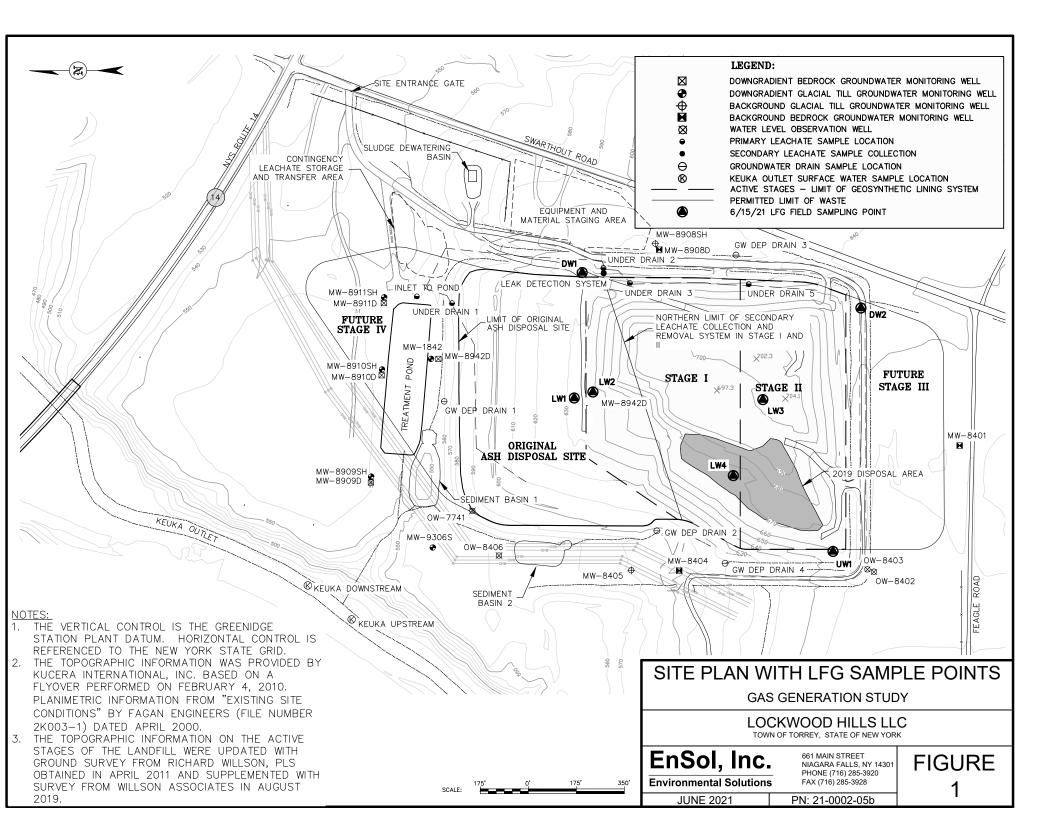
TABLE 1: LANDFILL GAS COMPOSITION AND VELOCITY RESULTS

*The temperature probe was positioned near the top of the borehole, likely biasing the temperature toward ambient air conditions. For all other LW readings, the temperature probe was positioned at the bottom of the borehole.

**Ambient readings are in miles per hour (mph) and After Purge LW readings are in feet per minute (fpm).

Lastly, velocity readings at all landfill waste points would begin at zero and increase slowly to a peak value. In LW1, LW2, and LW3, the velocity readings were erratic, fluctuating over the entire duration of measurement. Some, but not all fluctuations were noted in response to gusts of wind, although this was corrected by holding a plastic bag over the top of the PVC pipe to preclude air from entering the top of the pipe. For this reason, an average between zero and the peak value is most representative for gas velocity as presented in Table 1 for these three landfill waste sample points. The fluctuation seen at other landfill waste points was not observed at LW4, therefore, the peak reading at LW4 was considered most representative.

The velocity of gas flow measured at the landfill waste sample locations ranged from 1.2 to 5.2 feet per minute (fpm) with a peak velocity measurement range of 2.4 to 5.9 fpm. The cross-sectional area of the pipe was approximately 0.02 square feet. Thus, the volumetric flow rates ranged from 0.03 to 0.11 cubic feet per minute (cfm) with a maximum peak value of 0.13 cfm.



4. Discussion

The most significant finding of the study is that the low concentrations of CH₄ measured in all sample locations, including ambient and LW sample points, are within the instruments margin of error. Calibration information for the GEM5000 Plus indicates a margin of error of +/- 0.3% for CH₄. Additionally, ambient air concentrations for CO and CO₂ at 1 ppm and 0.1% are also within the instrument's margin of error of +/- 1 ppm for CO and +/- 0.5% for CO₂. Calibration information for the HY-ALERTATM did not provide margin of error information, however, the manual states that the meter's range is 0.0015 to 100%, therefore a reading of < 0.001% is below the operating range of the meter. The calibration information for both meters is included at the end of Attachment 2.

Given the above stated margin of errors, ambient air measurements at all locations were typical (http://tornado.sfsu.edu/geosciences/classes/m201/Atmosphere/AtmosphericComposition.html, accessed on June 17, 2021).

The gas composition observed in the LW sampling points is characterized by slightly depressed O_2 levels and slightly elevated CO_2 and CO levels, above the instrument's margin of error, as compared to the ambient air. The composition of gas at the landfill waste points was similar before and after purging. Purging did not appear to have a significant effect on the gas composition. The exception to this is the measurements of CO, which were elevated in initial borehole samples relative to both ambient and postpurge measurements.

The composition of gas in a typical landfill changes as the waste progresses through four phases of decomposition (Agency for Toxic Substances and Disease Registry, 2008, adapted from U.S. Environmental Protection Agency (USEPA), 1991). A graph depicting typical landfill gas concentrations in each phase is included in Figure 2. The composition of gas at all landfill waste sample points indicate a gas composition typically seen at the very beginning of Phase 1.

Phase 1 typically occurs in a span of days to months, yet waste at Lockwood has been in place for a minimum of two years to as much as four decades. If there was any appreciable degradation occurring, Phase 1 decomposition would have been completed by this time. Further, if a substantial amount of aerobic decomposition were occurring in the landfill, the oxygen in the landfill gas should have been depleted much more significantly over the past several years and concentrations of CO_2 and H_2 would have increased sharply. This was not the case as shown by the gas composition at all LW sampling points..

Another indicator of the lack of decomposition is the measured temperatures. The temperatures observed at points LW1, LW2, and LW3 are all below the range of temperatures typically seen in landfills due to biological activity (77 - 113 °F). The temperatures recorded at sample point LW4 were at the lower end of this range, but gas composition was not reflective of ongoing decomposition.

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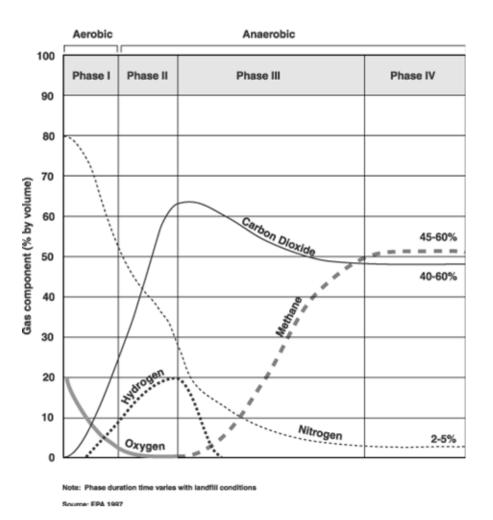


FIGURE 2: PRODUCTION PHASES OF TYPICAL LANDFILL GAS

Overall, the observed gas composition and concentrations in the LW sampling point were not reflective of landfill gas associated with any of the subsequent stages of decomposition. Thus, the argument that there is negligible decomposition occurring in the Lockwood landfill is supported by this study.

The equilibrium flow rates were all below 0.2 cfm, orders of magnitude lower than those reported in the study by Musselman et al. referenced by the NYSDEC. Flow rates in the Musselman et al. study ranged from 20 to 60 cfm. Musselman et al. also reported that flow rates between 30 and 60 cfm are typical of what might be expected at steady state conditions in an active municipal solid waste landfill. Additionally, Shaw Environmental Inc. (2005) reported flow rates of 13 standard cubic feet per minute (scfm) during a test on a passive vent system installed in Section E of a 150-acre landfill at Fort Ord in California. Fort Ord landfill was used to dispose of residential and limited amounts of commercial waste (U.S. EPA, 2021). These measurements were taken in 2003 nearly a decade after the landfill closed in 1994. The passive nature of a vent system closely approximates the conditions under which gas flow was measured at Lockwood. If the maximum flow rate seen at Lockwood were converted to scfm using the barometric

pressure at the time of sampling taken from a nearby weather station and the temperature recorded directly after purging the maximum flow rate observed at Lockwood is 0.13 scfm, two orders of magnitude lower than that reported at the Fort Ord landfill. The volumetric flow rates measured at the landfill waste sampling points do not suggest that a gas management system will be necessary at the Lockwood.

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5. Summary

As requested by the NYSDEC, this gas generation study was conducted to define the gas generation rate and gas composition of landfill gas at Lockwood and to determine if there is need for a landfill gas management system at Lockwood. Based on the concentrations and composition of gas sampled from the landfill waste sample points, there appears to be no evidence of significant decomposition occurring within the waste mass of the landfill. Volumetric flow rates measured onsite are orders of magnitude lower than those reported for a municipal waste combustor ash monofill (Musselman et al., 2000) and a passive venting system in a closed residential and commercial waste landfill (Shaw Environmental Inc., 2005). Based on the evidence gathered from this study, a landfill gas management system is not considered necessary to maintain the integrity of the final cover system at Lockwood.

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Attachment 1

Soil Gas Sampling Protocol

EnSol, Inc.



EnSol, Inc. 661 Main St. Niagara Falls, NY 14301 716.285.3920

ensolinc.com

Memorandum

Date: June 10, 2021

To: File

From: EnSol, Inc.

RE: Lockwood Ash Disposal Site Soil Gas Sampling Protocol, Rev. 2

The following is a protocol for the soil gas sampling event set to take place at the Lockwood Ash Disposal Site (the Site) during the spring of 2021.

SAMPLE LOCATIONS (see Attachment 1):

- 1 = Pre-Disturbance Downwind Background Ambient Air, Sample DW1
- 2 = Upwind Background Ambient Air, Sample UW1
- 3 = Original Ash Disposal Site, Point LW1
- 4 = Stage I Overfill, Point LW2
- 5 = Stage I; within 2019 disposal area, Point LW3
- 6 = Stage II; outside the 2019 disposal area, Point LW4
- 7 = Post-Disturbance Downwind Background Ambient Air, Sample DW2
- <u>ANALYTES</u>: Field Measurements Only CH₄, CO₂, O₂, CO, H₂S, H₂, balance gas, temperature, static pressure, differential pressure, and flow

STANDARD OPERATING PROCEDURE:

- 1) General Procedure
 - a. Three weeks prior to event:
 - i. Purchase AMS Telescoping Regular Auger Kit (2 ¹/₄" diameter), or equivalent, from EnviroSupply & Service
 - ii. Purchase molding clay from Michaels (2 1-lb blocks)
 - iii. Purchase plastic sheeting from Home Depot (10ft x 25 ft)
 - iv. Purchase 2" ID Schedule 40 PVC Pipe from Home Depot
 - b. One week prior to event:
 - i. Rent 1 Landtec GEM5000 Plus Landfill Gas Monitor, or equivalent, from Pine Environmental
 - ii. Rent 1 Dwyer Model 471B Digital Thermo Anemometer from Field Environmental Instruments
 - iii. Rent 1 HY-ALERTA 500 Handheld Hydrogen Leak Detector from Field Environmental Instruments
 - iv. Check forecast to ensure sample date will not fall within 48 hours of a rainfall event of 0.5 inches or greater
 - v. Contact Lockwood (Chris Gill) and arrange for access to the Site
 - c. One day prior to event:
 - i. Collect necessary equipment (See equipment list at end of this SOP)
 - ii. Double check forecast for the following day
 - iii. Confirm site access arrangements with Lockwood (Chris Gill)
 - d. Day of sampling event
 - i. Load required equipment into vehicle and travel to Site
 - Roughly determine wind direction using a wetted finger or a lighter flame to identify pre-disturbance downwind and upwind background ambient air sample locations
 - Walk to the pre-disturbance downwind sample location and record the location with a handheld global positioning system (GPS), then take an ambient air reading (See Step 2)

- iv. Confirm wind direction, then walk to the upwind sample location and record the location with GPS, then take an ambient air reading (See Step 2)
- v. Walk to the first LW location and record the location with GPS
- vi. Advance borehole and take measurements (See Step 3)
- vii. Collect a representative sample of excavated materials, then return excavated materials to the borehole, taking care to restore the intermediate cover thickness and grass plug
- viii. Repeat Steps 1(d)(v) through 1(d)(vii) for each LW sampling location
- ix. Again, confirm wind direction, then walk to the post-disturbance downwind sample location and record the location with GPS, then take the final ambient air reading (See Step 2)
- x. Pack up and return to office
- e. Day after sampling event
 - i. Upload field data and photographs and scan in Field Observation Forms
 - ii. Email Lockwood Hills LLC staff with sample point locations so intermediate cover can be reapplied to those areas, if necessary
 - iii. Return rental equipment
- 2) Ambient Air Sample Collection
 - a. Start the GEM5000 and allow the machine to self-test (approx. 10 seconds)
 - b. Go through Preliminary Checklist (See Attachment 2)
 - i. During Step 2 of the checklist choose the GEM5000 setting for landfill gas analysis
 - c. Select ID
 - d. Position the inlet probe of the GEM5000 one to two inches above the ground
 - e. Allow analyzer to purge with fresh air (approx. 30 seconds)
 - f. Use the temperature probe to obtain a temperature reading one to two inches from the ground. Record this value on the data sheet and enter it into the GEM when prompted.

- g. Press fan button to start sampling ambient air. Allow readings one to two minutes to stabilize. Record measurements for the ambient air sampling point in the GEM5000 and on a Field Observation Form.
 - When prompted for a temperature measurement use the Dwyer probe to obtain a temperature reading at the same height as the inlet probe on the GEM5000. Record the temperature on a field data form and enter it into the GEM5000 as prompted.
- h. Holding the probe tip sensor of the HY ALERTA probe at the same height as the GEM5000 inlet probe, obtain a measurement of H_2 gas and record on a field data form.
- 3) LW Sample Collection
 - a. Have the other team member perform an ambient air measurement as near to the sample location as possible (see Step 2)
 - b. Have one team member advance a borehole to a depth of 5.5 feet using a hand auger, placing excavated materials on plastic sheeting, with the cores in the order they were removed from the borehole
 - i. If materials encountered are resistant to the hand auger the field sampling team may choose to create a borehole and sample a different location within the same landfill cell
 - ii. Avoid generating dusty conditions by gently placing excavated materials onto the plastic sheet
 - c. Connect clear sample tube to white port and the sample point
 - d. Lower the white tube from the GEM5000 and the probe from the HY ALERTA to a depth of approximately 5 feet. Once the tubing and probe are at the required depth the opening of the borehole shall be sealed using molding clay. Insert the Dwyer probe vertically through the top of clay so temperature can be entered when prompted by the GEM5000. Use a sharpie to punch the hole and reform clay around the probe to prevent possible damage to the probe tip.

- Purge two sample volumes at a rate of 550 cc/min for approximately 17 minutes. This should equate to approximately 4.69 liters. Record calculated purge volume, rate, and duration of each purge on a Field Observation Form
- f. While purging is ongoing, have one team member characterize the core removed during excavation of the borehole (See Step 4)
- g. Once purging is complete follow the steps outlined in the GEM5000 Operating Manual (Attachment 3) and the on-screen directions to collect the required measurements. Record measurements on data sheets.
 - i. When directions call for disconnecting tubes from the sample point remove them from the ports on the GEM5000
 - ii. In addition to saving measurements in the GEM5000 the readings should also be noted on a Field Observation Form in the case data in the GEM5000 becomes corrupted
- h. Once purging is complete and readings appear stable, use the HY ALERTA probe to obtain a measurement of H₂. Record this value on the data sheet.
- i. Remove clay, tubing from the GEM, Dwyer probe, and the HY ALERTA probe from the borehole.
- j. To measure flow, fit the PVC pipe into the borehole and insert the Dwyer probe into the hole drilled on the PVC pipe with the dot on the probe facing into the flow (i.e., dot facing bottom of borehole). Seal the hole around the probe with clay. Turn the meter on and wait for readings to stabilize. Record the velocity of gas flow in feet per minute. Record this value on the data sheet. This value can be converted to a volumetric flow rate based on the cross-sectional area of the PVC pipe.
- 4) Characterization of Excavated Materials
 - a. While one sampling team member watches the GEM5000 to ensure proper functioning during the purging period, the other team member should characterize the materials excavated from the borehole

- Expected materials include intermediate cover as defined in the Site's O&M Manual, fly ash, bottom ash, pulverizer mill rejects, sludge/ash mixtures, and materials associated with dredging of the Treatment Pond.
- b. Record observations on a Field Observation Form and collect a representative sample in a glass jar. Label the jar with the date and sample location.
- c. Once characterization of the materials is complete the plastic sheeting should be folded over to prevent wind action on the materials from generating dust until the materials are returned to the borehole

EQUIPMENT LIST:

- 1 Landtec GEM5000 Plus Landfill Gas Analyzer (Rented from Pine Environmental)
- 1 Dwyer Model 471B Digital Thermo Anemometer
- 1 HY-ALERTA 500 Handheld Hydrogen Leak Detector
- 1 AMS Telescoping Regular Auger Kit (2¹/₄" diameter)
- 1 2" ID Schedule 40 PVC Pipe with a 25/64" hole drilled two feet from the bottom of pipe
- 1 GPS unit
- 1 Molding clay
- 1 Plastic sheet (10 ft x 10 ft)
- 1 Utility knife to cut plastic sheeting
- 1 Water bottle
- 1 Lighter
- 1 Field observations form
- 1 clip board and ballpoint pen
- 1 permanent marker (fine point)
- 1 timer device (e.g., cell phone)
- 1 Electronic copy of Landtec GEM5000 Landfill Gas Analyzer Operating Manual
- 1 Measuring tape
- 1 Shovel
- 1 Garbage bag
- 2 Sets of personal protective equipment (see below)

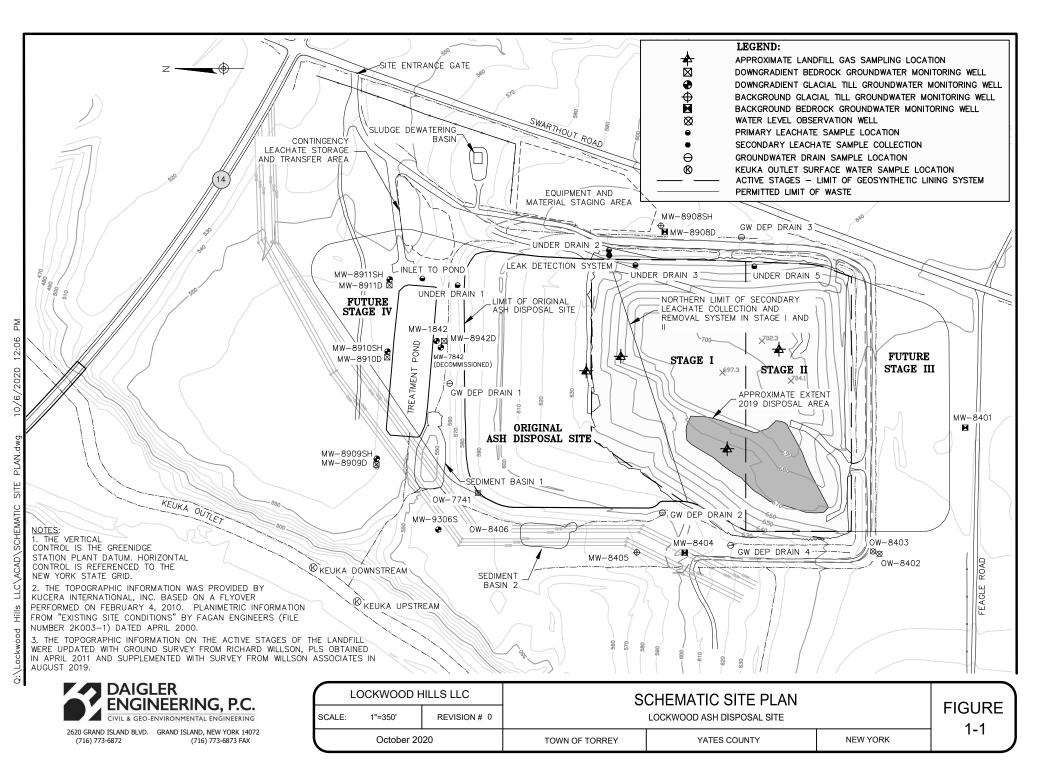
PERSONAL PROTECTIVE EQUIPMENT AND ACTIONS FOR WORK WITH FLY ASH:

- Face and Eyes: Goggles or safety glasses
- Clothing: Long sleeves, long pants; waterproof/resistant materials recommended
- Hands: Work gloves or butyl rubber gloves
- Feet: Shoes or work boots; boot covers recommended
- Wash exposed skin thoroughly after exposure
- Launder dusty or wet clothing after exposure to fly ash

• Dust generation and potential risk of inhaling fly ash will be minimized using operational controls including careful movement and placement of excavated materials and covering the materials with plastic sheeting following material characterization

ATTACHMENT 1

Schematic Site Plan

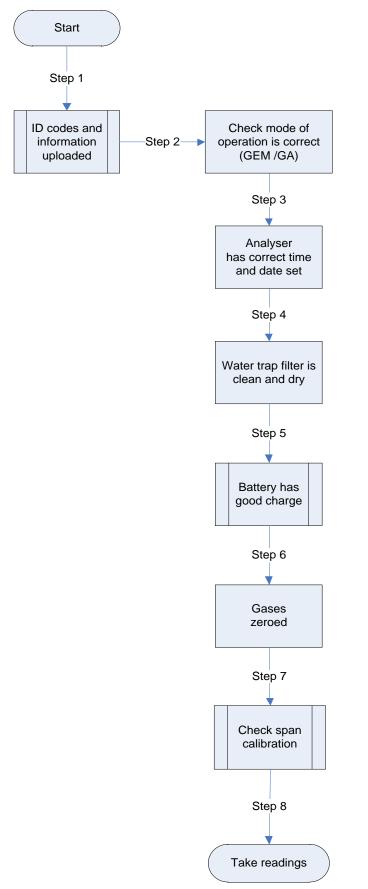


ATTACHMENT 2

Preliminary Checklist (Excerpt from GEM5000 Gas Analyzer Operating Manual)

8.0 Taking Readings

8.1 Preliminary checks before taking readings (best practice)



Prior to use, it is good practice to ensure that:

Step 1 If using LSGAM - all necessary ID codes and information have been uploaded from LSGAM to the analyzer. Please see section 8.1.1 for more information on this.

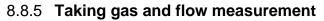
Step 2 Check the 'Mode of Operation' is correct. Choose either GEM5000 for gas extraction monitoring analyzer or GA5000 for landfill gas analyzer. Change using 'Special Actions'.

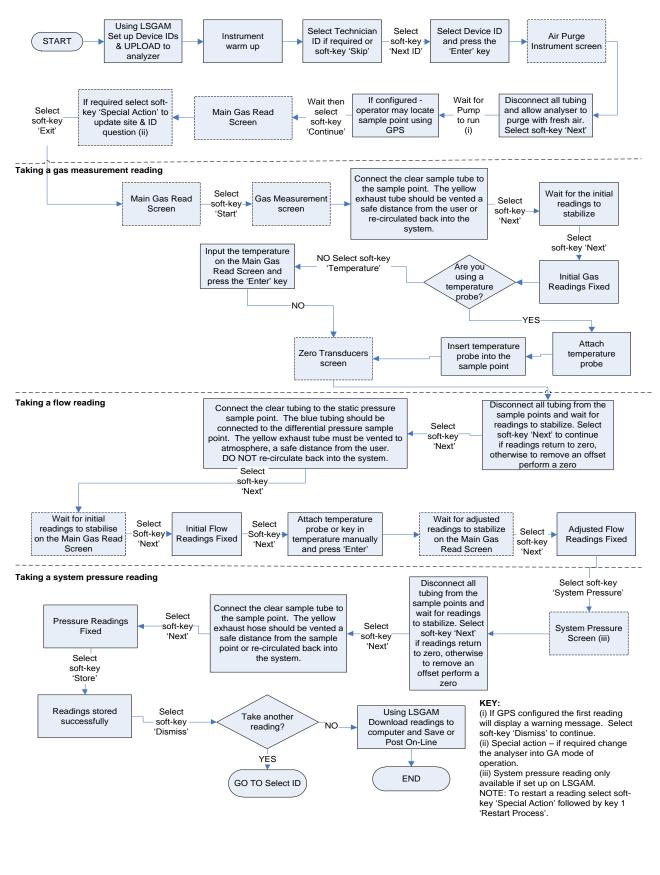
- **Step 3** The instrument has the correct time and date set.
- **Step 4** The water trap filter is fitted and is clean and dry.
- **Step 5** The battery has a good charge (minimum 25% charge, even if only a few readings are required).
- **Step 6** The gas channels have been zeroed, without gas concentration present.
- **Step 7** If necessary check the span calibration with a known concentration calibration gas.

Step 8 Take readings.

ATTACHMENT 3

Sampling Flow Diagram (Excerpt from GEM5000 Gas Analyzer Operating Manual)





Attachment 2

Field Data Form

EnSol, Inc.

Field Crew:	Ryan Elliott	Sam Daigler			
Date:	6-15-2021	<u>Jent y nyier</u>		. <u></u> .	
Weather:	Claudy Slight by	eeze, rain earlie	r in the day		
ir cutiter.		erce, rain count	- In the duy		
	Purge Time and	l			
Sample Point	Volume (liters)	Analyte	Result	Units	Time
DW1	NA	CH4	0.2	1.	
DW1	1/1/1	CO2		-/.	9:28 am
DW1		со	0.1	·	
DW1		02	21.1	ppm	.\
DW1		H2S	0	/	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
DW1 DW1		Balance Gas		рр м. - / -	
DW1 DW1		Static Pressure	-0:0178.7	1	
DW1		Differential Pressure	-0.01	"H20	
DW1 DW1		H2	0.001	"Hz0 */:	<u> </u>
DW1		Temperature	65.6	° F	
DW1		Flow	9		• • •
UW1	ŇĂ	CH4	0.2	mph 7.	9:52am
UW1		CO2	0.1	1.	1.5 Cam
UW1		СО	. [/ # 1	PPM	
UW1		02	21.2	-/-	, (
UW1		H2S	0	ppm	
UW1		Balance Gas	78.6	·/·	~ ``
UW1		Static Pressure	-0.02	"1420	
UW1		Differential Pressure	-0.007	"H20	~ \
UW1		H2	L0.01	·/.	<u></u>
UW1		Temperature		0F	~ ~ ~
UW1		Flow	64.3 9	mph	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
LW1 - Ambient	NA	CH4	0.2	د/ ,	10:25 am
LW1 - Ambient		CO2	0.1	-/.	
LW1 - Ambient		со		ppm	~ ^ `
LW1 - Ambient		02	21.2	1.	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW1 - Ambient		H2S	0	(pm	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW1 - Ambient		Balance Gas	78,5	~/,	11
LW1 - Ambient		Static Pressure	-0.01	"HzO	~ ~ ~ ~
LW1 - Ambient		Differential Pressure	-0,002	"HzO	~ ` `
LW1 - Ambient		H2	60.01	-1.	~ ~ ~ ~
LW1 - Ambient		Temperature	67.7	0F	//
LW1 - Ambient	I√ .	Flow	7 mph	mph	
LW1	17 min (4,69 L)	CH4	0.2 / 0.1*	11	11:30am
LW1		CO2	1.4 2.0.7	1.	
LW1		со	11 / 1	ppm	<u>.</u>
LW1		02	19.4 / 20.5	1.	<u> </u>
W/1		H2S		0.0.00	4

second is the measurement taken after purging. EnSol, Inc.

	Purge Time and				
Sample Point	Volume (liters)	Analyte	Result	Units	Time
LW1		Balance Gas	78.5/78.6	1.	11
LW1		Static Pressure	-0.02	"H20	11
LW1		Differential Pressure	-0.00	"H=0	
LW1		H2	20.001/20.01	-1.	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW1		Temperature	66.1/66.3	٥F	~ \\
LW1	V	Flow	0-2.4	FPM	11:41 am
LW2 - Ambient	NA	CH4	0.2	1.	12:00 pm
LW2 - Ambient		CO2	0.1	·/ ·	11
LW2 - Ambient		со	ł	ppm	~ ~ ~
LW2 - Ambient		02	21.4	-/-	~`
LW2 - Ambient		H2S	0	ppm	~~
LW2 - Ambient		Balance Gas	78.4	-/.	
LW2 - Ambient		Static Pressure	0.00	11/20	
LW2 - Ambient		Differential Pressure	500,0	11 HzO	~ ~ ~
LW2 - Ambient		H2	20.001	-/.	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW2 - Ambient		Temperature	66.8	σF	11
LW2 - Ambient	\checkmark	Flow	12	mph	~~~
LW2	17 min (4.69L)	CH4	0.2/0.1	7.	12:32 pm
LW2		CO2	0.9 / 0.8	-/.	
LW2		со	7/2	ppm	
LW2		02	20.4/20.8	-1.	- 1
LW2		H2S	0/0	ppm	~\
LW2		Balance Gas	78.1/78.3	-1.	11
LW2		Static Pressure	0.01	1' Hz 0	11
LW2		Differential Pressure	0,003	"H20	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW2		H2	60.01/60.001	1.	~ \ \
LW2		Temperature	66.8 / 59.6	0F	
LW2	∇	Flow	0-5.4	FPM	12:39 pm
LW3 - Ambient	NA	CH4	0.2	1.	1:31 Pm
LW3 - Ambient		CO2	0.1	11	
LW3 - Ambient	1	со	0	PPM	
LW3 - Ambient		02	21.4	./,	
LW3 - Ambient		H2S	0	ppm	
LW3 - Ambient		Balance Gas	78.4	-1.	
LW3 - Ambient		Static Pressure	0,01	"H20	
LW3 - Ambient		Differential Pressure	0.00	"HzO	
LW3 - Ambient		H2	60,01	-1.	
LW3 - Ambient		Temperature	67.3	0F	
LW3 - Ambient		Flow	12	mph	
LW3	$17 \min(4.69 L)$	СН4	0.2 / 0.2	-/,	2:00 pm
LW3		CO2	0.4/0.5	•]+	711
LW3	$\overline{\mathbf{V}}$	со	13 / 2	ppm	1(

	Purge Time and				
Sample Point	Volume (liters)	Analyte	Result	Units	Time
LW3		02	18.0/. 18.6	1,	11
LW3		H2S	0/0	Ppm	· · · · · · · · · · · · · · · · · · ·
LW3		Balance Gas	81.4/ 80.8	-1.	11
LW3		Static Pressure	0.01	"HrO	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW3		Differential Pressure	- 0.001	"H2O	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW3		H2	10.01/20.001	1.	~ ~ ~
LW3		Temperature	59,7/57.2	OF	~~~
LW3	\mathbf{V}	Flow	0-5.9	FPM	2:12 pm
LW4 - Ambient	NA	CH4	0.2	-/.	2:38 pm
LW4 - Ambient		CO2	0.1	-1.	11
LW4 - Ambient		со	1	ppm	h
LW4 - Ambient		02	21.2	-/-	1,2
LW4 - Ambient		H2S	0	PPM	11
LW4 - Ambient		Balance Gas	78.6	1.	11
LW4- Ambient		Static Pressure	0.003	"H20	
LW4 - Ambient		Differential Pressure	-0.001	"HzO	~ 1
LW4 - Ambient		H2	20.001	-/ ·	
LW4 - Ambient		Temperature	79.2	05-	11
LW4 - Ambient	V	Flow	8	mph	11
LW4	17min (4.69L)	CH4	0.2/0.1	-1.	3',04pm
LW4		CO2	1.0 / 0.8	-/.	
LW4		со	4/2	PPM	11
LW4		02	20.2/20.2	-/.	
LW4		H2S	0 / 0	ppm	~~~~
LW4		Balance Gas	78.6 / 78.9	-1.	
LW4		Static Pressure	6.00002	"HzO	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
LW4		Differential Pressure	0,002	"HzO	~ ~ ~
LW4		H2	60.01/60.001	-1.	~\
LW4		Temperature	78.0/80.9	0 F	~ \ \
LW4	\checkmark	Flow	5.2	FPM	3:15 pm
DW2	NA	CH4	0.2	·/·	3:57 pm
DW2		CO2		·/·	XX
DW2		CO	0.0 1	ppm	Ŷx
DW2		02	21.1	·/.	11
DW2		H2S	G	PPM	11
DW2		Balance Gas	78.7	· [;	~ ~ ~
DW2		Static Pressure	0,03	11 H20	
DW2		Differential Pressure	- 0.004	"Hz0	
DW2		H2	60.01	-1.	
DW2		Temperature	82.0	oF	
DW2	\checkmark	Flow	7 mph	mph	

Notes: Soil/Waste Characterization LW1: $(\mathcal{O}/\mathcal{D}S)$ grasses & crewn vetch ot NAR for tinal 4 1.5 G.Sm Until bottom of boilhole at ٣ Soil/Waste Characterization LW2: (Overf.)) Bred Cananya rass (cver intermeticae Gravelly than Bran, 1855 W1 12,25 ft starting ash hut 40 +1Mn diastein and! 10 00 1 6 ; around 60. 5-810-N Soil/Waste Characterization LW3: Stagez f1 Glasses & Clown vetch ~ 1.1 Cover after al.1 COVELSOILS f+ intil hattem of DESPIREP Soil/Waste Characterization LW4: 15 age 1 Bolg Disposal Area) Substantia grass cover than other locations w cleverst Light brown ranelli Sal voluntil~2ft , ash material more day like ¢ Yoe oncountered, most simil to LW1 -, incre than grev black NEG1 -Noflan could +P+ threvah PUL hand nauch 60 101 1 OFPM & Slowly - Flow would + voically start @ increase **GPS Coordinates:** 11 DW1: UW1: 176 LW1: 1 0 571 u 27 720 LW2: 420 40 76. 7 76 ና LW3: 42041 20. 571 39.8 76057 43 LW4: 42° 4011 21. -160 57' DW2: 42°41" 17.14 35 3 ч

GEM 5000 Plus



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301 Brushton Ave Suite A Pittsburgh, PA 15221 Toll Free (800) 393-4009 Local (412) 436-2600 Fax (412) 436-2616

Landtec Landfill Meter Calibration Certificate

Fresh Air Oxygen			Reading %	Acceptable Range (20.65% - 21.15%)
Cal Standard		Lot # 20-7696	Expiration 2/17/2025	
Methane			Reading %	Acceptable Range
Carbon Dioxide			Reading %	Acceptable Range (14.5% - 15.5%)
, Cal Standard		Lot # 20-7654-25	Expiration 1/26/2023	
Carbon Monoxide			Reading %	Acceptable Range
Hydrogen Sulfide			Reading %	Acceptable Range
Model S/N Barcode	GEM-5000+ G500846 U71054X			
Order #	456741	Calibrated By	Zach Crawford	
·		Date of Calibration	06/03/21	

All calibrations performed by Field Environmental Instruments conform to manufacturer's specifications. All calibration gas used is traceable to NIST. Additional documentation is available upon request.

Hildrogen Meter



Certificate of Conformance

Produ	act Declaration:
DATE:	September 14, 2020
PART NUMBER:	100500
MODEL:	500
MODEL SN:	A000285
SENSOR SN:	B12.07RB.00194STDHC
CHARGER SN:	150902
FIRMWARE REVISION:	S1.72/C1.27
SO# / PO#	10898 / 433262
Requirements this product is in t	Conformance with at time of manufactures
	Initials
Inspected per: H2scan procedures & drawings.	JL.
Tested per: H2scan procedures & specifications.	JL
Calibrated per: H2scan procedures & specifications.	JL
Calibration Gasses: Traceable to NIST standards.	JL

Date: September 14, 2020

Form #Q028 R1 15-March 2012

+lascan www.h2scan.com

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Acceptance Test H2scan Corporation 27215 Tumberry Lane, Suite A Valencia, CA 91355 (661) 775 - 9575

Model: 500

Assembly Serial Number: A000285

Sensor Serial Number: B12.07RB.00194STDHC Sales Order Number 10898

Sensor Temp, °C: 95

Background Gas: Air

Hydrogen Concentration [H2% by vol.]	Indication Pass/Fail	LED Array Pass/Fail	LCD Bars Pass/Fail	Keypad Pass/Fail
0.0	<u>j</u> a	P	P	
0.0	60	P,	P	
0.1	P.	P	Р	· P
2.0	P	p	P	
5.0	P	P	?	

GASES USED IN CALIBRATION HAVE BEEN CERTIFIED USING INSTRUMENTATION TRACEABLE TO THE NIST

85000012 R12, 12/17/15 500 Traveler

CERT, RMA4297 500HH

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H2scan Corporation 27215 Turnbery Lane, Suite A Valencia, CA 91355 (661) 775 - 9575

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I ~ I2SCan www.h2scan.com

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WRS Sensor S/N B12.07RB.00194STDHC Sensor PCBA S/N BL1044-21 Sales Order Number 10898

Sensor Op. Temp. [°C] 95 Background Gas Air

85000012 R12, 12/17/15 500 Traveler

			A.	Acceptance Test Procedure	st Proce	edure							Βy	Date
0 0	rd Manufac	sturing Proce	Record Manufacturing Procedure Revision	on (86000012) 2	2			Reco	Record Firmware Revision 0.00	: Revision	0.00			
								Roc	Room Temperature [°C] 24.7	Iture [°C]	24.7		κM	9/14/20
e .	Cylinder	Pressure	Exposure	Press.Comp. LED P/F LED LCD	LED	P/F LED		P/F	<h2% or<="" th=""><th></th><th>Toloranco</th><th>P/F</th><th></th><th></th></h2%>		Toloranco	P/F		
	H2% Conc	[psia]		H2% Conc Array	Array	Array		Bars	Indicated	EILOI		H2%		
i	0.0000	14.198	0 C C	0.0000	0	3	0	Q.,	< 0.001			S.,		
L	0.0098	14.198	5	0.0095	0	۵.	3	ڡ	< 0.01			۵.		
1	0.1010	14.198	5	0.0976	-	е.	5	۵.	< 0.1			۵.		
<u>.</u>	1.9760	14.197	5	1,9089	e	e.	11	4	2.1	0.1911	0.3573	a.		
<u> </u>	4.9950	14.197	5	4.8254	S	¢.	12	£2.,	5.1	0.2746	0.4448	٤.	KM	KM 9/14/20
E					** • •				Ċ					••••••••••
									ز					

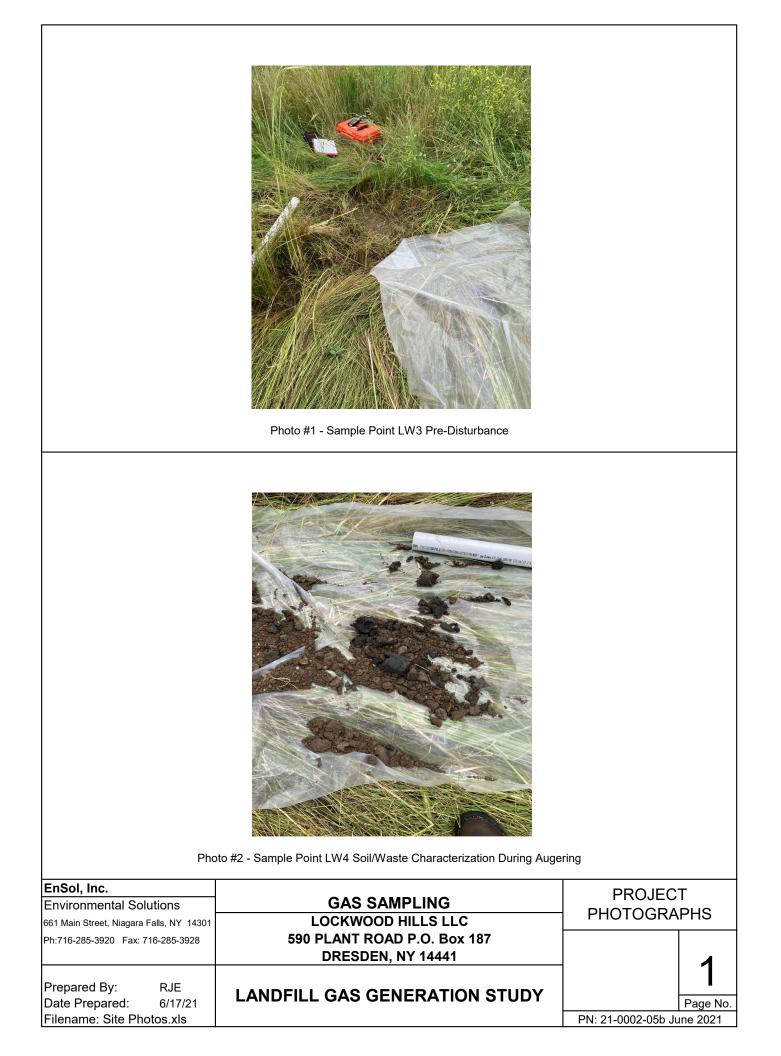
		Keypad Test Procedure			B	Date
Steps after ATP	Keypad	ICD Display	Boostd Haif Eirmunso / Sariat Alumbar	P/F		
-	ENTER	Information Disp		٥.		
2	right	Firmware Rev S1.XX /C0.XXX	\$1.72/C1.27	a. ,		
3	down	Serial Number: A000XXX	A000285	۵.		
4	dn dn	Calibration Date XX/XX/XX		a.		
5	left	Information Disp		۵.	ΣX	KM 9/14/20

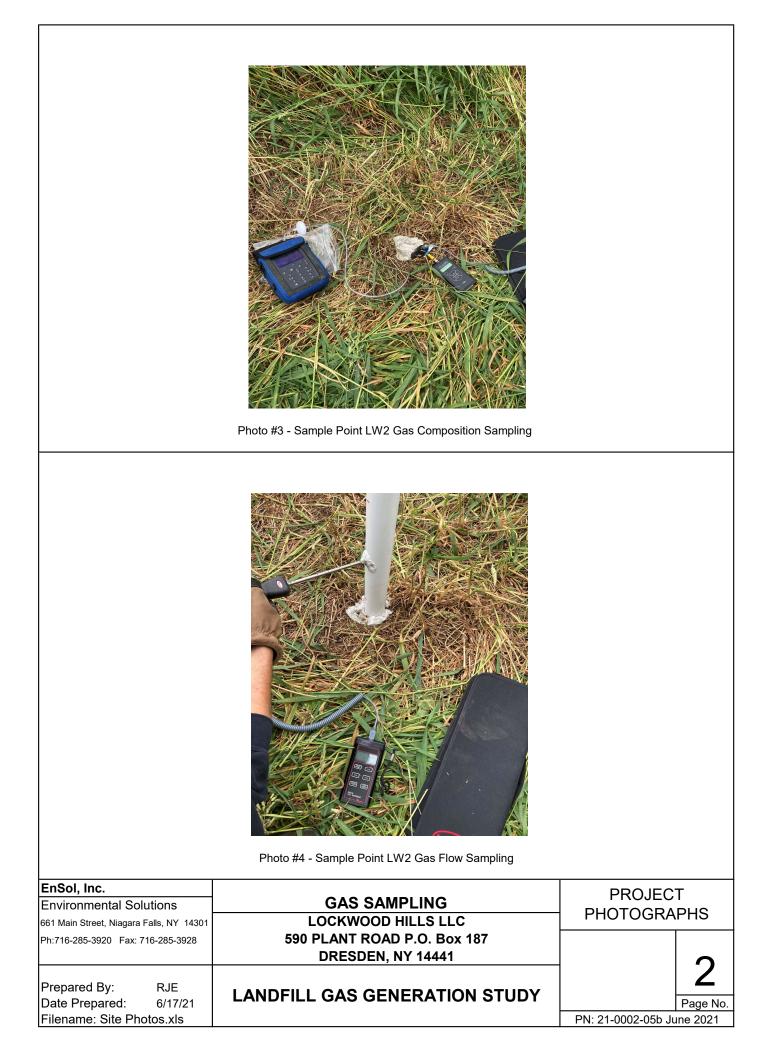
ATP, RMA4297 500HH

Attachment 3

Representative Photographs

EnSol, Inc.





Attachment 4

Works Cited

EnSol, Inc.

Works Cited

- Alexander, A., Burklin, C., & Singleton, A. (2005). Landfill Gas Emissions Model (LandGEM) Version 3.02 User's Guide (Report No. EPA-600/R-05/047).
- Agency for Toxic Substances and Disease Registry. (2001). Chapter 2: Landfill gas basics. In *Landfill Gas Primer* – An Overview for Environmental Health Professionals. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry, Division of Health Assessment and Consultation.
- Arm, M. & Lindeberg, J. (2006). Gas generation in incinerator ash. The International Conference on the Environmental and Technical Implications of Construction with Alternative Materials, ISCOWA, Belgrade, Serbia & Montenegro.
- Elcock, D. & Ranek, N.L. (2006). Coal Combustion Waste Management at Landfills and Surface Impoundments, 1994-2004 (Report No. DOE/PI-0004). United States Department of Energy.
- Food and Agriculture Organization of the United Nations. (2006). Livestock's role in climate change and air pollution. Food and Agriculture Organization of the United Nations. *Livestock's Long Shadow*. (p. 92).
- Fischer, C. (1999). *Gas Emission from Landfills: An overview of issues and research needs* (Report No. AFR-REPORT 264). Swedish Environmental Protection Agency.
- Musselman, C.N., Straub, W.A., Bidwell, J.N., Carpenter, J.E., & Presher, J.R. (2000). Gas Generation at a Municipal Waste Combustor Ash Monofill Franklin, New Hampshire. *Sustainable Construction: Use of Incinerator Ash, Dhir, R.K., Dyer, T.D., Paine, K.A., Dundee.*
- Muyzer, G. & Stams, A.J.M. (2008). The ecology and biotechnology of sulphate-reducing bacteria. *Natural Reviews Microbiology*, *6*, 441-454. http://dx.doi .org/10.1038/nrmicro1892.
- Power Plant Service, Inc. (2014). Steam Tables. https://energy.mo.gov/sites/energy/files/steam-tables_powerplant-service.pdf, last accessed on June 24, 2021.
- Shaw Environmental, Inc. (2005). Draft Final Work Plan Landfill Gas System Expansion Operable Unit 2 Landfills Former Fort Ord, California Total Environmental Restoration Contract DACW05-96-D-0011 Appendix B. https://docs.fortordcleanup.com/ar_pdfs/AR-OU2-648F/Appendices/Appendix_B.pdf, last accessed June 24, 2021.
- U.S. Environmental Protection Agency. (1991) Air Emissions from Municipal Solid Waste Landfills -Background Information for Proposed Standards and Guidelines. (March 1991) Office of Air Quality Planning and Standards. Research Triangle Park, North Carolina. EPA-450/3-90-011a. Chapter 3 and 4.
- U.S. Environmental Protection Agency. (2004). US emissions inventory 2004: Inventory of U.S. greenhouse gas emissions and sinks: 1990-2002. United States Environmental Protection Agency.
- U.S. Environmental Protection Agency. (2008). Municipal Solid Waste Landfills. In United States Environmental Protection Agency. *AP-42 Compilation of Air Pollutant Emission Factors Volume I: Stationary Point and Area Sources*. United States Environmental Protection Agency.

ENSOL, INC.

U.S. Environmental Protection Agency. (2021). FORT ORD | Superfund Site Profile | Superfund Site Information | US EPA. Website: https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second .cleanup&id=0902783. Last Accessed on July 25, 2021. United States Environmental Protection Agency.