



Seneca Meadows, Inc.

*1786 Salcman Road
Waterloo, NY 13165
(315) 539-5624
Fax: (315) 539-3097*

September 15, 2023

Peter Porcelli
Code Enforcement Officer
Town of Seneca Falls – Office of Zoning & Code Enforcement
130 Ovid Street
Seneca Falls, NY 13148

Re: Seneca Meadows, Inc. – Odor Complaint Investigation & Corrective Actions

Dear Mr. Porcelli:

Seneca Meadows, Inc. (SMI) is responding in writing with SMI's investigations and corrective actions with relation to the alleged odor complaints on July 12th, July 19th, and August 16th from Mark Pitifer at Waterloo Container with address 2311 New York State Route 414, Waterloo, NY 13165 which is directly across the street from SMI.

Both SMI and the Town of Seneca Falls (SF) responded to all three alleged odor complaints. SMI spoke with the SF Office of Zoning & Code Enforcement and confirmed the following regarding SF's odor investigations:

- July 12th, ~8:01 A.M. – A faint landfill gas (LFG) related odor was detected both inside and outside of Waterloo Container.
- July 19th, ~9:41 A.M. – Municipal Solid Waste (MSW) odors were detected outside of Waterloo Container.
- August 16th, ~8:48 A.M. – No landfill related odors were detected outside of Waterloo Container.

SMI has generated odor investigation reports for all three odor complaints. Those odor investigation reports can be found in Appendix A. Here is a summary of the findings in those reports:

- July 12th, 9:14 A.M. – Municipal Solid Waste (MSW) odors were detected outside of Waterloo Container. ~0.5-1 on the N-Butanol scale. Odor Control (OC) equipment was



checked and adjusted as needed. The scent level in the NCM 1 unit, which is in the “drop & hook” parking lot, was increased at 9:15 A.M. No landfill related odors were detected during the 11:00 A.M. road run which can be found in Appendix B.

- July 19th, 10:22 A.M. – No landfill related odors were detected outside of Waterloo Container.
- August 16th, 9:48 A.M. – No landfill related odors were detected outside of Waterloo Container.

In addition to the odor investigation reports, SMI has generated daily construction inspection reports for all three days that odor complaints were made. These daily construction inspection reports can be found in Appendix C. A map of the construction work with the proximity to Waterloo Container can also be found in Appendix D. Here is a summary of those daily construction inspections:

- July 12th – Horizontal collectors were being tied into a manifold at elevation 590’.
- July 19th – Horizontal collectors were being installed at elevation 590’ directly into the waste. 421’ of perforated 6-inch diameter pipe was installed directly into the waste.
- August 16th – Horizontal collectors were being installed at elevation 590’ directly into the waste. 242’ of perforated 6-inch diameter pipe was installed directly into the waste. A 3rd party contractor was preparing for vertical well installation. However, no vertical well installation occurred on this date.

It is SMI’s experience that horizontal collector installation creates minimal LFG odors given the horizontal collectors are placed into newer waste. Vertical well installation has a greater possibility of creating LFG related odors since vertical well installation typically takes place in older waste. However, as mentioned above, no vertical well installation occurred during the dates of the odor complaints.

SMI has many control measures in place to control odors and limit the effects on the surrounding community. Those control measure are as follows:

- Limit the idling of over-the-road vehicles that are staged on-site.
- 24hr Operation of the landfill gas collection and control system. This is designed to provide sufficient capacity to collect the landfill gas that is generated and to combust all landfill gas that is collected.
- Operational practices to minimize the size of the working face throughout daily operational time frames.

- As soon as operationally possible, the application of daily cover, intermediate, and final cover.
- Monthly and Quarterly surface monitoring for landfill gas emissions, and to evaluate collection and cover effectiveness.
- Screening incoming waste for excessive intense odors and limiting the number of odorous wastes which are accepted.
- Ensuring that leachate vehicles and existing leachate collection wells are properly covered and sealed. The proposed leachate collection system will be maintained under negative pressure to control odor.
- Placement of additional cover on waste materials that have strong odors.
- Monitoring and increasing the rate of the collection and control of landfill gas, if necessary.
- Working face control measures, such as minimizing the duration which an area is open.
- Application of odor neutralizers, suppressants, or masking agents. This includes a misting system installed around the site and the use of solid granular neutralizers on the working area at the end of the day in cold weather.

In addition to all the control measures that are in place, SMI has established a complaint plan that can be utilized for landfill related odors along with other potential nuisances. Here is a summary of that plan:

- SMI will maintain its 24 hour per day, toll free telephone number for the receipt of citizen complaints regarding landfill operations.
- When the Landfill Operations Manager receives the original odor investigation checklist, he will investigate the incident. This investigation will involve the necessary steps to address the issues identified on the odor investigation checklist.
- The Landfill Operations Manager will investigate the complaint and determine what measure(s), if any, should be implemented to mitigate the incident. If required the Landfill Operations Manager, or his designee, will then direct personnel and equipment to mitigate the problem and complete the odor investigation checklist.
- A copy of completed complaint forms will be filed at the SMI office and a copy of the odor investigation checklist forms will be submitted to the NYSDEC. Each complainant will

receive a copy of the completed complaint form relating to their complaint as soon as practicable after the investigation of the reported incident.

If you have any additional questions or concerns, please feel free to contact SMI at (315) 539-5624.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Pannucci". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Pannucci
Regional Engineer

Cc: K. Black – SMI
J. Burrier – SMI
M. Ferrara – Town of Seneca Falls

Appendix A

Odor Investigation Reports

ODOR INVESTIGATION CHECKLIST

Date/Time of Call: 7-12-23 8:08AM

Date/Time of Incident: 7-12-23 8:08AM

Description of Odor: "Raw Garbage"

Location of Odor: Waterloo Container

Duration of Odor: Ongoing

Name/Address: Mark Pitifer
2311 NY-414
Waterloo, N.Y. 13165

Phone No. of Caller: 315-283-3507

Temp/Wind Spd/Dir: 69 Deg. 5 MPH. West Northwest Wind

AT THE TIME OF THE INCIDENT;		YES	NO	N/A	COMMENTS
Did wind direction indicate SMI could be potential odor source?		x			
Was there a known, non-landfill related odor source?			x		
Was there adequate daily cover?		x			
Was there adequate intermediate cover?		x			
Were the landfill gas plants operating?		x			
Were the flares operating?		x			
Was landfill gas collection system operating?		x			
Was an unusual amount of odorous waste received?			x		
Was sludge covered as soon as practicable?		x			
Was there any odor generating construction going on?		x			Waste Placement
Were the misters, vapor systems operating?		x			

Weather/Date/Time/ of Investigation: 7/12/2023 9:14am

West 7 MPH

AT THE TIME OF THE INVESTIGATION;		YES	NO	N/A	COMMENTS
Did you detect odor on-site?			x		
Did you detect odor at complaint site?		x			Municipal Solid Waste

Corrective Action (if applicable)/Notes: Went to the caller's location, at the time of the investigation there is odor of Municipal Solid Waste at about a 0.5 - 1 on the N-Butanol scale.

Checking and readjusting OC equipment.

Seneca Meadows implements a number of controls to help contain odor, including: minimizing the size of the daily disposal area, applying more daily cover than what's required, applying cover throughout the day & rolling it at the end of the work day, and running odor neutralizing mist lines.

Investigator Signature: Andy Hubbard

ODOR INVESTIGATION CHECKLIST

Date/Time of Call: 7-19-23 9:41am

Date/Time of Incident: 7-19-23 9:35am

Description of Odor: "Chemical Gas Smell"

Location of Odor: 2311 Route 414 (Waterloo Container)

Duration of Odor: Ongoing

Name/Address: Mark Pitifer
2311 Route 414
Waterloo, N.Y. 13165

Phone No. of Caller: 315-759-8735

Temp/Wind Spd/Dir: 75 Deg. 2 MPH West Northwest Wind

AT THE TIME OF THE INCIDENT;		YES	NO	N/A	COMMENTS
Did wind direction indicate SMI could be potential odor source?		x			
Was there a known, non-landfill related odor source?			x		
Was there adequate daily cover?		x			
Was there adequate intermediate cover?		x			
Were the landfill gas plants operating?		x			
Were the flares operating?		x			
Was landfill gas collection system operating?		x			
Was an unusual amount of odorous waste received?			x		
Was sludge covered as soon as practicable?		x			
Was there any odor generating construction going on?		x			Waste Placement
Were the misters, vapor systems operating?		x			

Weather/Date/Time/ of Investigation: 7-19-23 10:22am

North Northwest 3 MPH

AT THE TIME OF THE INVESTIGATION;

Did you detect odor on-site?

Did you detect odor at complaint site?

YES

x

NO

x

N/A

COMMENTS

Municipal Solid Waste

Corrective Action (if applicable)/Notes: Went to caller's location, at the time of the investigation there is no landfill odor.

Seneca Meadows implements a number of controls to help contain odor, including: minimizing the size of the daily disposal area, applying more daily cover than what's required, applying cover throughout the day & rolling it at the end of the work day, and running odor neutralizing mist lines.

Investigator Signature: Andy Hubbard

ODOR INVESTIGATION CHECKLIST

Date/Time of Call: 8-16-23 8:50am
Date/Time of Incident: 8-16-23 7:30am

Name/Address: Mark Pitifer
2311 Route 414
Waterloo, N.Y. 13165

Description of Odor: "Garbage"
Phone No. of Caller: 315-759-8735

Location of Odor: 2311 Route 414
Temp/Wind Spd/Dir: 69 Deg. 3 MPH West Northwest Wind

Duration of Odor: Ongoing

AT THE TIME OF THE INCIDENT;				COMMENTS	
Did wind direction indicate SMI could be potential odor source?	YES	NO	N/A		
Was there a known, non-landfill related odor source?		x			
Was there adequate daily cover?	x				
Was there adequate intermediate cover?	x				
Were the landfill gas plants operating?	x				
Were the flares operating?	x				
Was landfill gas collection system operating?	x				
Was an unusual amount of odorous waste received?		x			
Was sludge covered as soon as practicable?	x				
Was there any odor generating construction going on?	x			Waste Placement	
Were the misters, vapor systems operating?	x				

Weather/Date/Time/ of Investigation: 8-16-23 9:48am
West Northwest 10 MPH

AT THE TIME OF THE INVESTIGATION;

Did you detect odor on-site?

Did you detect odor at complaint site?

Corrective Action (if applicable)/Notes: Went to caller's location, at the time of the investigation there is no landfill odor.

Seneca Meadows implements a number of controls to help contain odor, including: minimizing the size of the daily disposal area, applying more daily cover than what's required, applying cover throughout the day & rolling it at the end of the work day, and running odor neutralizing mist lines.

Investigator Signature: Daryl Wilkins

Appendix B
7/12/23 Road Runs

ROAD RUNS (R & R)

Note: #1 R R will be a "full" circle around (Rt. 414, North Rd., Burgess, Strong Rd, Worden, Black Brook)

Winds & time #1 WNW @ 6:30am time #2 WSW @ 11am time #3 NW @ 2pm

time #4 N @ 3:30pm time #5 _____ time #6 _____

Examples: LFG MSW Other, Clear (Agriculture, Non-Landfill, Unknown etc.)

Comments: _____

Road Run Findings

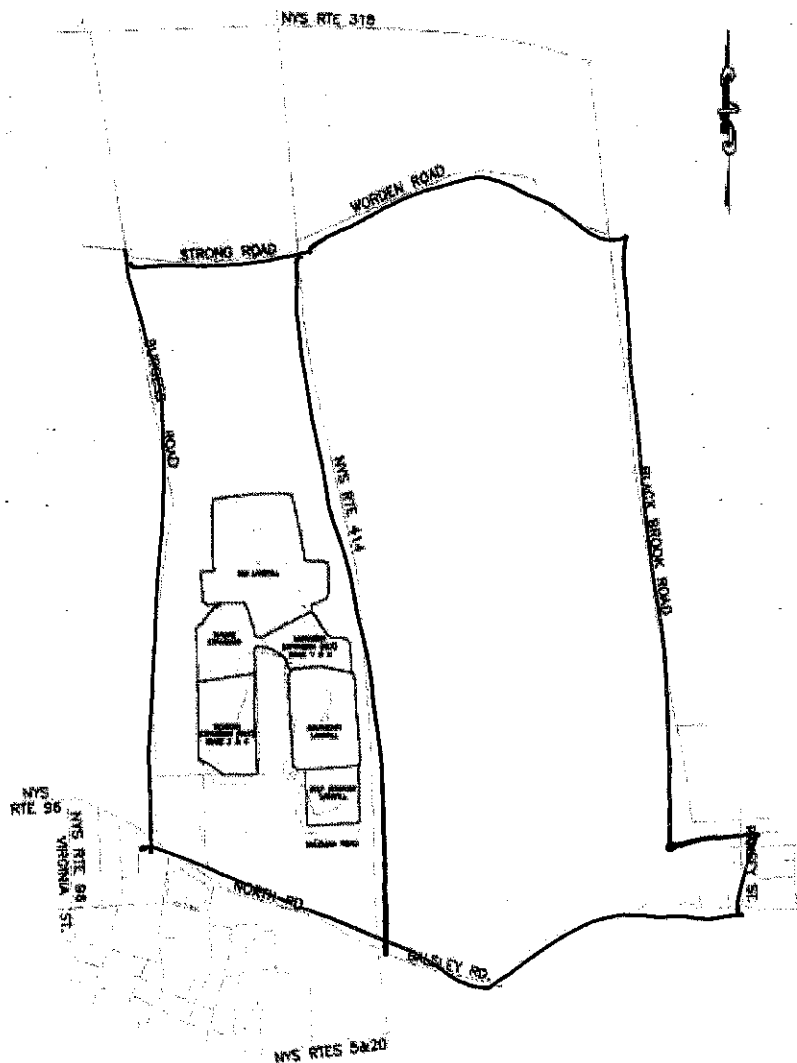
	Clear	See Map	Initials	Time
1.	X		AH	6:30am
2.	X		AH	11am
3.	X		AH	2pm
4.	X		AH	3:30pm
5.				
6.				

Notes

On Site Odors Detected

	Clear	See Map	Initials	Time
1.	X		AH	6:30am
2.	X		AH	11am
3.	X		AH	2pm
4.	X		AH	3:30pm
5.				
6.				

Notes



OC Daily Log

Sun. M T W Th. F Sat.

ODOR CONTROL TEAM

WEATHER

		Time
Andy H.	<u>X</u>	<u>6 am</u>
Daryl W.	<u>X</u>	<u>6:30 am</u>
Jordan S.		
Jake D.		

6:30am	Temp. <u>68</u>
Wind <u>WNW</u>	Mph <u>6</u>
11:00am	Temp. <u>75</u>
Wind <u>WSW</u>	Mph <u>1</u>
2:00pm	Temp. <u>83</u>
Wind <u>NW</u>	Mph <u>4</u>
3:30pm	Temp. <u>83</u>
Wind <u>N</u>	Mph <u>5</u>
5:30pm	Temp.
Wind	Mph

Date: 7-12-23

Start Time: 6 am

Closing Time: 4pm

Name: AH

Western Expansion/Office/ Area 5 & 6 & 6a

Hawc Systems: 1 NCM Zones: _____ Cat Pump System: 4

S.E.L.F / Bump-Out & Drop & Hook

Vapor Systems: _____ NCM Zones: _____ Cat Pump Zones: 4

Northeast Expansion 7-8A

Hawc Systems: 1 NCM Zones: _____ Cat Pump System: 3

Gas issues: Informed Compliance Group: Tyler Woodard, Allen Larsen yes / no

Time: _____

Odor Issues: Informed Odor Control: Andy Hubbard yes / no

Time: _____

MSW / Leachate Issues: Informed Scott Knowlton, Josh Emerson yes / no

Time: _____

Treatment Plant Issues: Informed Scott Zimmerman yes / no

Time: _____

Notes:

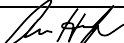
Appendix C

Daily Construction Inspection Reports

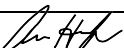
DAILY CONSTRUCTION INSPECTION REPORT

PROJECT: SITE-WIDE HC & LAT. INSTALLATION & CERT		DATE:07/12/2023
PROJECT NO.: 001-A0001-01		CLIENT: SMI
ARRIVE TIME: 7:00 AM		DEPART TIME 4:00 PM
WEATHER CONDITION: PC 85 DEGREES		
CONTRACTOR PERSONNEL AND EQUIPMENT:		
SMI: 2 MAN CREW		
WORK IN PROGRESS:		
HCD/MANIFOLD INSTALLATION		
MATERIALS RECEIVED:		
NONE		
<p>SMI CREW EXCAVATING AND INSTALLING MANIFOLD-12-590, MADE OF 6" SOLID PIPE (203 FT) INCLUDING THREE PRONGS AND A 50 FOOT SECTION EXTENDING TO A 90 DEGREE RISER. GAS COLLECTION PIPE HCD-12A-590 (51 FT) AND HCD-12B-590 (84 FT) ARE TIED INTO THE MANIFOLD, BOTH 6" PERFORATED PIPE. ENSOL SURVEY LOCATED STARTING POINTS FOR MANIFOLD/HCD INSTALLATION. ENSOL COLLECTS PIPE PLACEMENT RECORD DATA OF INSTALLED PIPE. PIPES BURIED DIRECTLY IN WASTE AND BACKFILLED WITH EXCAVATED MATERIAL, AND MIN. 6 INCHES OF COVER TO GRADE.</p> <p>TO COMPLETE THIS INSTALLATION, SMI FUSED 253FT OF SOLID 6" PIPE, AND 135 FT OF PERFORATED 6" PIPE. FUSING CONDUCTED ON IN THE SHELTER BOX IN STONE YARD. ENSOL INSPECTS WELD QUALITY. ALL WELDS LOOK GOOD AND ARE TO PROJECT SPECIFICATIONS.</p>		
OBSERVER: 		SIGNATURE: AEH

DAILY CONSTRUCTION INSPECTION REPORT

PROJECT: SITE-WIDE HC & LAT. INSTALLATION & CERT		DATE:07/19/2023
PROJECT NO.: 001-A0001-01		CLIENT: SMI
ARRIVE TIME: 7:00 AM		DEPART TIME 5:00 PM
WEATHER CONDITION: SUNNY 89 DEGREES		
CONTRACTOR PERSONNEL AND EQUIPMENT:		
SMI: 2 MAN CREW		
WORK IN PROGRESS:		
HCD INSTALLATION		
MATERIALS RECEIVED:		
NONE		
SMI CREW EXCAVATING AND INSTALLING GAS COLLECTION PIPE HCD-11A-590. 421 FT OF PERFORATED 6-INCH DIAMETER PIPE IS INSTALLED. ENSOL SURVEY LOCATED STARTING POINT FOR HC INSTALLATION. ENSOL COLLECTS PIPE PLACEMENT RECORD DATA OF INSTALLED PIPE. PIPE BURIED DIRECTLY IN WASTE AND BACKFILLED WITH EXCAVATED MATERIAL AND MIN. 6 INCHES OF COVER SOIL TO GRADE.		
OBSERVER:		SIGNATURE: AEH

DAILY CONSTRUCTION INSPECTION REPORT

PROJECT: SITE-WIDE HC & LAT. INSTALLATION & CERT		DATE:08/16/2023
PROJECT NO.: 001-A0001-01		CLIENT: SMI
ARRIVE TIME: 7:00 AM		DEPART TIME 4:00 PM
WEATHER CONDITION: CLOUDY 75 DEGREES		
CONTRACTOR PERSONNEL AND EQUIPMENT:		
SMI: 2 MAN CREW		
WORK IN PROGRESS:		
HC INSTALLATION		
MATERIALS RECEIVED:		
NONE		
SMI CREW EXCAVATING AND INSTALLING GAS COLLECTION PIPE TENTATIVELY NAMED HC-815-590. 242 FT OF PERFORATED 6-INCH DIAMETER PIPE IS INSTALLED. ENSOL SURVEY LOCATED STARTING POINT FOR HC INSTALLATION. ENSOL COLLECTS PIPE PLACEMENT RECORD DATA OF INSTALLED PIPE. PIPE BURIED DIRECTLY IN WASTE AND BACKFILLED WITH EXCAVATED MATERIAL, AND MIN. 6 INCHES OF COVER SOIL TO GRADE.		
OBSERVER:		SIGNATURE: AEH

ENSOL, INC.
NIAGARA FALLS, NEW YORK

DAILY CONSTRUCTION INSPECTION REPORT

PROJECT: STAGE 7-8 LFG (VERTICAL WELL CONSTRUCTION)		DATE:8/16/2023
PROJECT NO.: 0001-A0002		CLIENT: SMI
ARRIVE TIME: 7:00 AM		DEPART TIME 5:00PM
WEATHER CONDITION: CLOUDY, 75 DEGREES		
CONTRACTOR PERSONNEL AND EQUIPMENT: DC RAUSCHER		
BRANDON (EXCAVATOR) , 4 LABORERS		
EXCAVATOR, 1 OFF ROAD DUMP, DRILL RIG, MCELROY FUSION MACHINE		
WORK IN PROGRESS:		
PIPE WELDING, ROAD BUILDING		
INSPECTIONS/TESTS/SAMPLES:		
NONE		
MATERIALS RECEIVED:		
NONE		
<p>CONSTRUCTION ACTIVITIES: DC RAUSCHER ON SUMMIT OF SOUTH SIDE OF STAGE 5 FUSING 8" SOLID PIPE FOR FUTURE INSTALLATION OF GAS HEADERS FOR STAGE 5. FUSING CONDUCTED ON STAGE 5 NEAR DRILLING SITE. ENSOL INSPECTS WELD QUALITY. ALL WELDS LOOK GOOD AND ARE TO PROJECT SPECIFICATIONS.</p> <p>DC RAUSCHER BUILDING NEW SHALE ROAD TO ACCESS DRILLING LOCATION (GW 102). SHALE IS BEING TRANSPORTED VIA OFF-ROAD DUMP TRUCK. ROADS ARE BEING FORMED BY EXCAVATOR. NEWLY CONSTRUCTED ROAD EXAMINED FOR STABILITY.</p>		
OBSERVER: 		SIGNATURE: ANNA HRYWNAK

Appendix D
Daily Construction Proximity Map



TITLE: WATERLOO CONTAINER

GRAPHIC SCALE: 0' 250' 500'

NOTE: WORK PERFORMED ON 7/12/23, 7/19/23, & 8/16/23