

DELTA SOLID WASTE MANAGEMENT AUTHORITY

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Received EGLE/AQD	
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File _____	
CC _____	

March 13, 2023

EGLE, AQD, Marquette District
1504 West Washington St
Marquette, MI 49855

Dear Ms. Luce,

This is a response letter from DSWMA on the Violation Letter dated February 23, 2023. An inspection of Delta County Landfill was performed on December 13, 2022. Listed below are the response and corrections listed based on each violation. Our job is to comply to state regulations and that is what we always strive to do therefore, as soon as we were notified that Ms. Luce wanted changes made, we started the process immediately.

In response to EUASBESTOS first and foremost we were unaware that we were out of compliance as under the previous administrator our 3/16/2021 inspection done by Sydney Hewson states in these words exactly "warning signs and an adequate barrier are present." Therefore, it was believed we were in compliance. As soon as we were notified that we were out of compliance proper signage was placed at the entrance of each cell along with perimeter signage placed at 330 ft intervals and a sign placed at the area of the asbestos hole on cell 6A, as the picture shows (#1). We started correcting this violation on December 14, 2022 and completed the correction on December 22, 2022.

The second violation under EUASBESTOS was on the asbestos hole. Asbestos is being placed in the one area on cell 6A. We took it upon ourselves to berm the area better as you can see in the attached photo (#2) so that the area cannot be entered and the asbestos is being covered with 6" of soil at the end of each operating day, this was corrected on December 14, 2022. We were not having staff members drive in to cover asbestos daily as it was a health risk, after berming the area the cover can be dropped in the hole to cover the asbestos and does not require them to come in contact with the asbestos.

The third violation listed under EUASBESTOS, I have attached a copy of the asbestos hole map and coordinates on cell 6A for additional review (#3), we always have maps constructed with our annual volume survey but unfortunately we had to obtain our volume survey from a new company this year, so they did not have the asbestos portion completed on the map at the time of the inspection, this was corrected on January 26, 2023 when they provided us the actual map, prior to that we had the area constructed on our GPS unit only on our Bomag.

In response to EUFURNACE1 the additional flow meter was placed on the oil furnace and completed on January 23, 2023; we started the process immediately on December 14, 2022, although it did take time

to get in the parts and for the installer to get it operating optimally. The gallons of oil burned on an hourly basis is now monitored daily. In the previous years the depths were measured by inches and converted by the engineers at WSP to gallons burned, once we were informed this is no longer adequate, we immediately put in motion a plan to add the required meters. (See picture #4) Daily emission checks on the 25-foot stack were being done daily they were not recorded unless there was an issue noted; we recorded the data only if we saw emissions and we have not seen any issues. We check this on our daily flare checks and it is now being recorded on a daily basis since December 13, 2022.

FGLANDFILL-AAAA We are not out of compliance. The area that shows the exceedances is in the calibration part of the report, when the machine goes through its initial calibration. As you can see on the attached report from 9/10/2021 pages 1-8 are the calibration portion and everything above the yellow line does not indicate exceedances. It is therefore believed that the quarterly surface emissions monitoring survey data is being reviewed correctly by DSWMA staff and the exceedances noted on 9/10/21 and 8/29/22 were during the calibration process and not during the actual monitoring. We have consulted with SEM 5000 support and they have confirmed that our equipment is functioning correctly and in fact the exceedances noted are only during the calibration portion. We also reached out to Bruce Connell from Environmental Partners who does all of our air and gas emissions and reporting to confirm the readings and he agreed that the DSWMA's information is correct and that you can see by the GPS coordinates that the machine is in one spot as it calibrates and those are not exceedances.

DSWMA strives to always remain in compliance with regulations required and any additional requests in a timely manner. At this time, we believe that we have met all of the requirements to return to compliance, and in some instances the information states we were not out of compliance. If you need anything further or if you have any questions, please feel free to contact me.

Thank you,



David Lundquist
Operations Manager
Delta Solid Waste Management Authority

cc: Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
PO Box 30260
Lansing, MI 48909-7760
File

1



ENTER

CAUTION

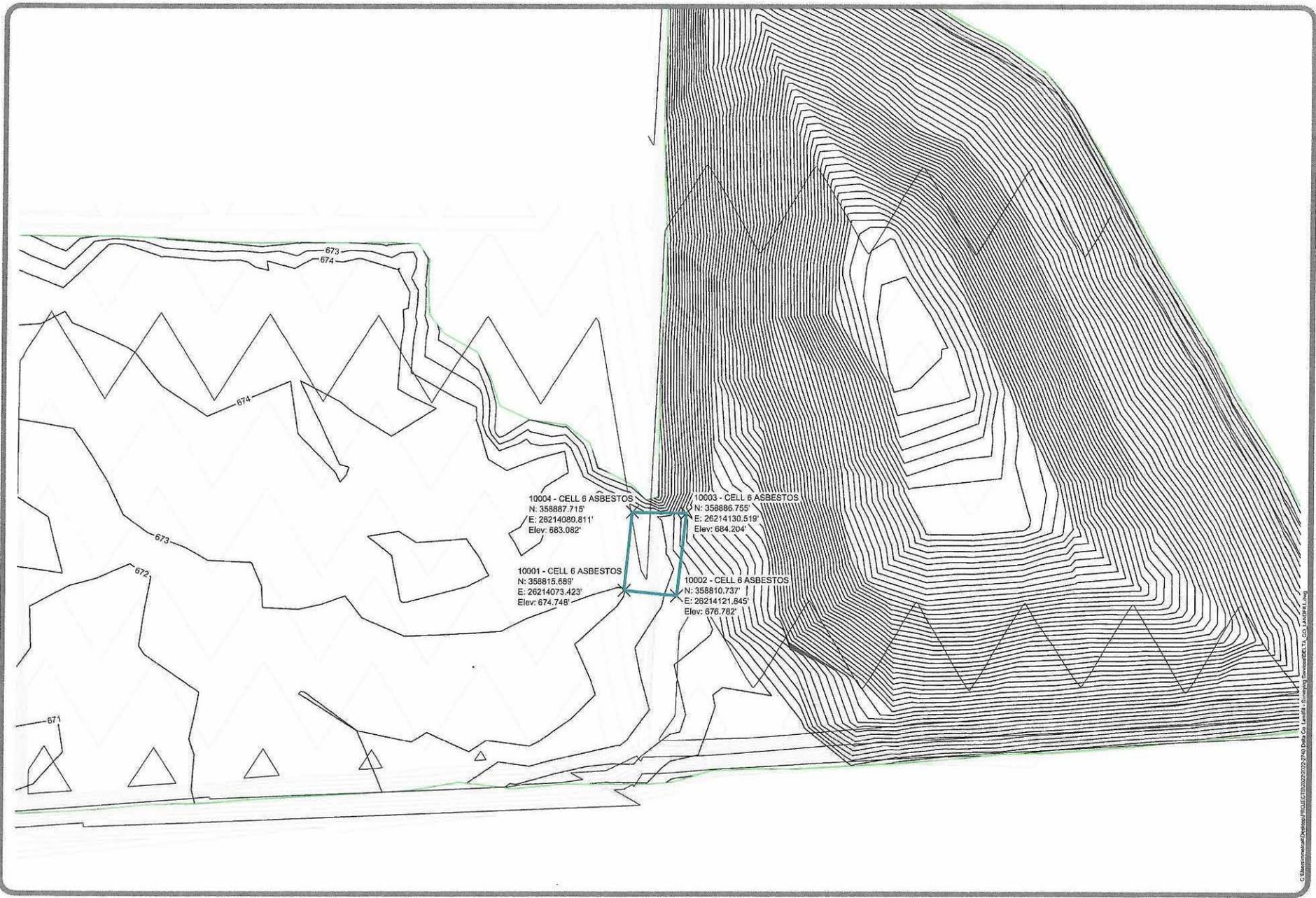
**ASBESTOS WASTE
DISPOSAL SITE.
DO NOT
CREATE DUST
BREATHING
ASBESTOS
IS DANGEROUS
TO YOUR HEALTH.**

#2



CAUTION
DO NOT ENTER
DANGER OF COLLAPSE
OR OTHER HAZARDS
BEYOND THIS POINT





Delta County Landfill
Asbestos Storage Area
Escanaba, Michigan

DATE	DESCRIPTION	ISSUED
01/25/23	Issue/Revised	

DESIGNED:	MLC
DRAWN:	DMV
CHECKED:	DMV
APPROVED:	DMV

TRIMEDIA
JOB NUMBER:
2022-2740
SHEET TITLE:

Topographic
Basemap

SHEET NUMBER:
1

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#4

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