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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

| N824839852 | | |
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| FACILITY: MONTMORENCY-OSCODA-ALPENA WASTE MANAGEMENT AUTHORI | | SRN / ID: N8248 |
| LOCATION: 6751 LANDFILL RD, ATLANTA | | DISTRICT: Cadillac |
| CITY: ATLANTA | | COUNTY: MONTMORENCY |
| CONTACT: Connie Gerrie , Administrator | | ACTIVITY DATE: 05/17/2017 |
| STAFF: Rob Dickman | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Scheduled inspectio | n of this major source. | |
| RESOLVED COMPLAINTS: | | <u> </u> |

Montmorency-Oscoda-Alpena Solid Waste Management Authority (SWMA) Landfill is a Type II Sanitary Landfill, which accepts municipal solid waste (MSW) and inert wastes. The facility also accepts a minimal amount of asbestos containing waste. The solid waste is transported to the facility to an area (cell) where it is deposited on the working surface. The deposited waste is covered with soil on a daily basis. When a cell reaches its design capacity, a liner is installed to cover the waste. Over time, the waste decomposes producing landfill gas (LFG). The LFG is comprised of methane, carbon dioxide, carbon monoxide, and volatile organic compounds (VOCs). MSW initially undergoes aerobic microbial activity producing predominately nitrogen gas and carbon dioxide. As oxygen levels decline, gas composition changes to a mixture of methane and carbon dioxide. LFG typically contains a small percentage of non-methane organic compounds (NMOC). The NMOC fraction consists of various organic hazardous air pollutants (HAPs), greenhouse gases, and volatile organic compounds (VOCs).

Inspected this source per ROP Number MI-ROP-N8248-2015. This ROP expires in April of 2020. Prior to entering the facility, it was noted that winds were moderate and out of the south. No odors were noted downwind of the facility. Following are the findings of the inspection based on current applicable conditions:

<u>EULANDFILL<50</u> - This emission unit is of a landfill which has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters, but actual emissions based upon an established Tier 2 value in the landfill calculation, is less than 50 megagrams. This landfill also has received a volume expansion (increased the design capacity) permit from the DEQ, since May 30, 1991, and therefore making the landfill subject to NSPS, Subpart WWW.

- I. EMISSION LIMIT(S) NA
- II. MATERIAL LIMIT(S) NA
- III. PROCESS/OPERATIONAL RESTRICTION(S) NA
- IV. DESIGN/EQUIPMENT PARAMETER(S) NA

V. TESTING/SAMPLING

The facility has chosen to perform Tier 2 testing and LandGem modelling as the method of compliance to demonstrate NMOC emissions. This testing was performed on April 28 and 29th, 2015. Testing and modelling demonstrated that the facility is well below the 50 Mg per year NMOC emissions rate. The projected NMOC emission rate for this year is 11.7 Mg per year.

VI. MONITORING/RECORDKEEPING

The facility is required to keep a record of changes to their design capacity. The landfill has not undergone any expansions in the last 12 months and none are scheduled. A discrepancy in the initial design capacity of the facility was noted this year and corrected. Please see MACES for further details. The facility continuously monitors the waste taken in and calculates waste in place on a monthly basis. Records of this were available and projections for it were included with the Tier 2 testing results. Also included were NMOC emissions projections which indicate the facility will never reach the 50 Mg/year NMOC threshold at current waste acceptance rates.

VII. REPORTING

The facility currently submits semi-annual and annual ROP reports in a timely manner. The facility also submits NMOC emissions data per the MAERS reporting system(see MACES).

VIII. STACK/VENT RESTRICTION(S) - NA

IX. OTHER REQUIREMENT(S)

The facility is required to install capture and control devices pursuant to 40 CFR 60, Subpart WWW should the NMOC emissions rate exceed 50 Mg per year. The latest testing indicates an NMOC emission rate of approximately 11.7 Mg per year and modelling indicates the 50 Mg per year threshold will not be exceeded at the current waste acceptance rate.

<u>EUASBESTOS</u> - This emission unit represents any active or inactive area within the landfill which has accepted asbestos waste.

I. EMISSION LIMIT(S) - NA

II. MATERIAL LIMIT(S) - NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

This facility takes in asbestos waste as defined by 40 CFR 61 Subpart M. The procedure the facility selected and uses for acceptance and handling of this waste is as follows:

-The waste generator must schedule delivery of the waste with the landfill no less than 24 hours ahead of time.

-Upon delivery, the waste is placed in a pre-surveyed area of the landfill and covered immediately. -The location of the waste is then placed on a map.

The facility is secured and properly signed pursuant to the conditions of the ROP.

IV. DESIGN/EQUIPMENT PARAMETER(S)

The facility is not required to install gas collection in the landfill at this time. However, should they be, the location of asbestos containing waste is mapped such that these areas can be avoided during gas collection construction. The facility does not currently segregate asbestos containing waste.

V. TESTING/SAMPLING - NA

VI. MONITORING/RECORDKEEPING

The facility is required to maintain the following information on a per shipment basis:

- i. The name, address, and telephone number of the waste generator.
- ii. The name, address, and telephone number of the transporter(s).
- iii. The quantity of the asbestos-containing waste material in cubic meters (cubic yards).
- iv. The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers.
- v. The date of the receipt.

A review of the records indicates this information is being kept for every shipment of asbestos containing material received. No discrepancies in this information were noted. As noted above, records of the location, nature, and quantity of each shipment were being kept. Also as noted above, any shipment received was covered immediately eliminating any chance of any friable material becoming airborne.

VII. REPORTING

The facility currently submits semi-annual and annual ROP reports, usually in a timely manner. At no time in the last 12 months was any asbestos containing waste disturbed from its original placement, therefore no reporting was submitted to that effect.

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VIII. STACK/VENT RESTRICTION(S) - NA

IX. OTHER REQUIREMENT(S) - NA

At the time of the inspection, this facility was in compliance with their air permitting.

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