

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N824866367

<b>FACILITY:</b> MONTMORENCY-OSCODA-ALPENA WASTE MANAGEMENT AUTHORI		<b>SRN / ID:</b> N8248
<b>LOCATION:</b> 6751 LANDFILL RD, ATLANTA		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> ATLANTA		<b>COUNTY:</b> MONTMORENCY
<b>CONTACT:</b> Connie Gerrie , Administrator		<b>ACTIVITY DATE:</b> 02/08/2023
<b>STAFF:</b> Caryn Owens	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> On-site Inspection & Records Review		
<b>RESOLVED COMPLAINTS:</b>		

On Wednesday, February 8, 2023, , Ms. Caryn Owens of the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) inspected Montmorency-Oscoda-Alpena Solid Waste Management Authority (MOA) Landfill, located at 6751 Landfill Road in Atlanta, Montmorency County, Michigan. More specifically the site is located on the east side of County Road 487, approximately 3 miles north of County Road 612. The field inspection and records review were to determine compliance with the Renewable Operating Permit (ROP) MI-ROP-N8248-2020a. This site is subject to the Federal Plan requirements for Municipal Solid Waste Landfills as specified in 40 CFR Part 62, Subparts A and OOO (40 CFR Part 62 Subpart OOO). This site is an area source of hazardous air pollutants (HAPs) and emits less than 34 megagrams (Mg) of non-methane organic compounds (NMOCs). The source is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos in 40 CFR Part 61, Subpart M.

The site is a Type II Sanitary Landfill, which accepts municipal solid waste (MSW) and inert wastes from three Counties of Montmorency, Oscoda, and Alpena. 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 NMOC. The NMOC fraction consists of various organic HAPs, greenhouse gases, and VOCs.

#### **Evaluation Summary**

Based on the activities covered during this field inspection, the facility is out of compliance with ROP MI-ROP-N8248-2020a. AQD recommends the landfill begin recording the depth the asbestos containing material is buried at the landfill. Specific permit conditions that were reviewed are discussed below.

#### **On-site Inspection:**

AQD met with Connie Gerrie of MOA when I first arrived at the site, and she assisted with onsite records. I was also escorted around the facility by Mr. Doug Baker of MOA to observe landfill operations. The weather was sunny and approximately 42 degrees Fahrenheit, with winds approximately 5 to 10 miles per hour from the southwest. The landfill was blanketed with snow cover (less than a foot), except for the active area currently accepting waste.

AQD observed the area where the facility deposits asbestos, which is deposited on the edges of cells A2 and 3, just west of the active portion of the landfill. According to the records and through discussions with Ms. Gerrie, no asbestos containing material has been accepted since the beginning of January 1, 2023. Additionally, the site was installing an injection well for their leachate, and I observed the drill rig installing the new well. The facility plans to begin using the new injection well in early summer. Additionally, I observed the active portion of the landfill where the current accepted waste is deposited (in B2 and B3 portions now and will move to the corner of B1 in the summer). Then we drove around the boundaries of the active landfill. I observed the three new flares that were recently installed on the southern, southwestern, and western portions of the landfill to control a build-up of off-gas from LFG. The southwestern and western flares were installed in the closed cells 1-4 of the landfill. No flames were observed from the newly installed flares during the inspection, and according to Mr. Baker, the southern flare had a flame when it was initially installed, but no longer has enough gas to ignite it. The southwestern flare had a flame once for a short period of time (during the early morning), but has not ignited since, and there has been no flame on the western flare. The facility has checked the flares and they appear to be operating appropriately. We drove past where a newly installed lift station that was installed to send the leachate from the closed cells to the two leachate lagoons. The lift station replaces the former two underground storage tanks that were in this area and used to store the leachate from the closed cells. According to Mr. Baker, the facility pumps approximately 15,000 gallons of leachate per week to the lagoons. During the inspection, no landfill odors were present.

The facility is claiming the following exemption applies at the facility:

- Two leachate lagoons and associated collection equipment and the 3 flares meet exemption Rule 336.1285(2) (aa).

#### **Records Review:**

#### **EULANDFILL<34**

A MSW landfill that commenced construction, reconstruction, or modification on or before July 17, 2014, and has accepted waste at any time since November 8, 1987. The MSW landfill has a design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters, but actual NMOC emissions based upon an established Tier 2 value in the landfill calculation are less than 34 Mg per year. This emission unit is subject to the requirements of 40 CFR Part 62, Subpart 000.

- There are no applicable **Emission Limits, Material Limits, Process/Operational Restrictions, Design/Equipment Parameters, or Stack/Vent Restrictions** for EULANDFILL.
- **Testing/Sampling:** The facility completed Tier 2 NMOC Testing October 7, 2020 and has chosen to perform use LandGem modelling as the method of compliance to demonstrate NMOC emissions. Based on review of the Test Report using EPA's LandGEM Landfill Gas Emissions Model (Version 3.02), the revised 2019 NMOC emissions rate was calculated at 2.872 Mg/yr. This was well below the 34 Mg/year and MOA will not be required to install a collection and control system.
- **Monitoring/Recordkeeping:** The facility is required to keep records of their design capacity, and monitor and record the current amount of solid waste in-place and the year by year acceptance rates. AQD reviewed these records during the inspection. The facility has no changes to their design capacity.

Additionally, the facility calculates the NMOC emission rates on an annual basis to confirm the NMOC emission rates are below the 34 Mg/yr to maintain a Tier 2 status landfill.

- **Reporting:** Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the AQD in timely manner. The facility also submits NMOC emissions data per the MAERS reporting system.

Additionally, as previously stated, Tier 2 Testing was completed in October 2020. In July 2022, the ROP was re-opened to remove the obsolete Conditions requirements related to 40 CFR Part 60, Subpart WWW and add new applicable requirements associated with 40 CFR Part 62, Subpart 000. With incorporating the newly applicable requirements of 40 CFR Part 62, Subpart 000, the facility is required to report their 5-year Tier 2 Testing to EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) following their next NMOC Emission rate test.

- **Other Requirements:** The facility is below the 34 Mg/yr NMOC emission rate and does not have plans at this time to install a capture and control system in accordance with 40 CFR 62.16714(b) and (c) or conduct a surface emission monitoring demonstration using Tier 4 procedures.

#### **EUASBESTOS:**

This emission unit represents any active or inactive area within the landfill which has accepted asbestos waste.

- There are no applicable **Emission Limits, Material Limits, Testing/Sampling, Stack/Vent Restrictions, or Other Requirements** for EUASBESTOS.
- **Process/Operational Restrictions:** This facility takes in asbestos waste as defined by 40 CFR 61 Subpart M. AQD observed no visible emissions during the inspection in the area where asbestos containing waste material was deposited and the area was covered in snow. The facility is in a rural area and there is a natural barrier plus fencing that deters the general public from entering. According to Mr. Baker, once a load of asbestos is scheduled to be brought to the landfill, a hole in a specific, marked area of the landfill is dug, and once the asbestos containing material (ACM) is disposed, the hole is covered immediately. The location of the asbestos material is surveyed and marked on a map and displayed in the hallway of the office. The area with asbestos will not be disturbed in the future.

- **Design/Equipment Parameters:** As previously stated, all asbestos containing material cells buried in the landfill are mapped and surveyed. The area of the asbestos containing materials will be excluded from proposed placement of a new gas collection systems.
- **Monitoring/Recordkeeping:** Shipment records with names, address, and telephone numbers of the waste generators and transporters were reviewed. Each shipment record had the associated location with a map of the facility and the buried asbestos locations identified. Based on discussions with Ms. Gerrie, 33 yards of asbestos containing waste was collected in the calendar year 2022. If there are any discrepancies of the quantity of waste designated on the waste shipment records and the quantity received, the discrepancy is discussed with the waste generator, and AQD observed where the facility clarified the discrepancy on the shipment records. As noted on the records, any shipment received was covered immediately to minimize a chance of any friable material becoming airborne. No visible emissions were noted based on observations while depositing the asbestos containing waste material in the landfill. AQD observed that the depth is not located on the form and requested that the depth of the load also be included on the future records.
- **Reporting:** The facility currently submits semi-annual and annual ROP reports in a timely manner. There are no records indicating that any asbestos containing waste areas were disturbed from its original placement, therefore no reporting was submitted.

NAME *Camp Owens*

DATE \_\_\_\_\_

SUPERVISOR \_\_\_\_\_