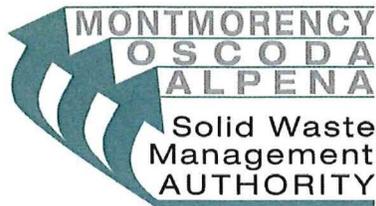
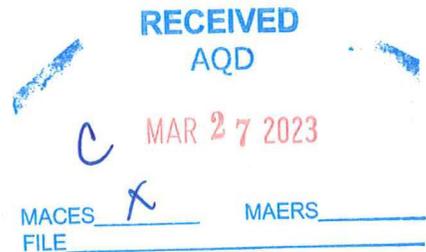


CHUCK VARNER, CHAIRMAN
BILL PETERSON, VICE- CHAIRMAN
GARY GIRARDIN, SEC. /TREAS.
JACKIE BONDAR
DON EDWARDS
BURT FRANSISCO



6751 Landfill Road
P.O. BOX 13
Atlanta, MI 49709
989-785-6500

Email: MOALandfill@Frontier.com



March 20, 2023

Sent via e-mail:
owensc1@michigan.gov

Caryn Owens, Senior Environmental Engineer
Michigan Department of Environment, Great Lakes and Energy (EGLE)
Air Quality Division
120 West Chapin St.
Cadillac, MI 49601

RE: Violation Notice
Montmorency-Oscoda-Alpena Solid Waste Management Authority
ROP: MI-ROP-N8248-2020a
SRN: N8248
Monitoring/Recordkeeping SC VI.2

Dear Ms. Owens:

The violation letter dated March 2, 2023, requests actions necessary to correct the cited violation identified on the February 8, 2023, inspection listed below:

“The condition of ROP number MI-ROP-N8248-2020a requires records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area storage.”

Following discussions with MOA Landfill representatives and EGLE-AQD, we believe that the above observations are inaccurate and do not constitute a violation of the applicable legal requirement cited.

MOA Landfill does in fact keep a site map (attached) up to date that shows the location and quantity of asbestos-containing waste material (ACM). We believe that the reason for the violation letter was due to the elevation column not being clear to EGLE as to the depth the ACM is buried. In a follow-up phone call following the issuance of the violation letter, Gosling Czubak Engineering Services explained to EGLE-AQD that the top of waste is surveyed every quarter. If ACM was buried in that quarter, then the elevation is documented as less than the surveyed elevation. The elevation of waste is never greater than five feet in a quarter; therefore, the elevation of ACM will be within five vertical feet below the “elevation” measurement provided on the site map. In addition, the horizontal location, date of placement, and quantity of ACM is included on the site map.

Following this explanation, we believe that Montmorency-Oscoda-Alpena Solid Waste Management Authority (MOA Landfill) is not in violation of their ROP.

Please feel free to contact myself, Adam Segerlind, or Eric Vincke with any questions or comments.

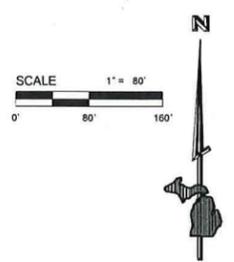
Sincerely,



Connie Gerrie
Administrator
MOA Solid Waste Management Authority

Cc via emails:

Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Shane Nixon, EGLE
Phil Roycraft, EGLE
Eric Vincke, GCES
Adam Segerlind, GCES
MOA SWMA Board



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CIVIL ENGINEERING
 SURVEYING
 ENVIRONMENTAL SERVICES
 GEOTECHNICAL
 CONSTRUCTION SERVICES
 DRILLING
 LANDSCAPE ARCHITECTURE

ASBESTOS DISPOSAL LOCATION SUMMARY				
LOCATION ID	PLACEMENT MONTH/YEAR	APPROX. QNTY, CYD	ELEVATION*	LOCATION NOTES
1	8/2019	564	<1131'	LOCATION BASED ON OPERATIONS RECORDS
2	9/2016	2	<1155'	LOCATION BASED ON OPERATIONS RECORDS
3	10/2016	<1	<1130'	LOCATION BASED ON OPERATIONS RECORDS
4	11/2017	1	<1141'	LOCATION BASED ON OPERATIONS RECORDS
5	7/2018	<1	<1139'	LOCATION BASED ON OPERATIONS RECORDS
6	7/2018	2.5	<1176'	LOCATION BASED ON OPERATIONS RECORDS
7	8/2018	21.5	<1142'	LOCATION BASED ON OPERATIONS RECORDS
8	11/2018	5	<1130'	LOCATION BASED ON OPERATIONS RECORDS
9	1/2019	10	<1102'	LOCATION BASED ON OPERATIONS RECORDS
10	1/2019	9	<1153'	LOCATION BASED ON OPERATIONS RECORDS
11	3/2019	2	<1156'	LOCATION BASED ON OPERATIONS RECORDS
12	7/2019	38	<1193'	LOCATION BASED ON OPERATIONS RECORDS
13	8/2019	3	<1163'	LOCATION BASED ON OPERATIONS RECORDS
14	10/2019	155	<1152'	LOCATION BASED ON OPERATIONS RECORDS
15	10/2019	110	<1158'	LOCATION BASED ON OPERATIONS RECORDS
16	11/2019	3	<1126'	LOCATION BASED ON OPERATIONS RECORDS
17	12/2019	48	<1157'	LOCATION SURVEYED 1/29/2020
18	9/2020	10.5	<1123'	LOCATION BASED ON OPERATIONS RECORDS
19	9/2020	34	<1123'	LOCATION BASED ON OPERATIONS RECORDS
20	11/2020	20	<1127'	LOCATION BASED ON OPERATIONS RECORDS
20	3/2021	88	<1127'	LOCATION BASED ON OPERATIONS RECORDS
	4/2021	41	<1130'	
	5/2021	5	<1130'	
	6/2021	47	<1130'	
	6/2021	47	<1130'	
21	3/2021	4	<1127'	LOCATION BASED ON OPERATIONS RECORDS
	4/2021	10	<1130'	
	6/2021	48	<1130'	
	7/2021	1.5	<1130'	
	8/2021	21	<1131'	
	12/2021	1	<1131'	
	2/2022	20	<1135'	
	4/2022	12	<1135'	
8/2022	1	<1140'		

- NOTES**
- LOCATIONS OF ASBESTOS CONTAINING MATERIALS (ACM) THAT WERE NOT SURVEYED ARE BASED UPON OPERATIONAL RECORDS MAINTAINED BY MOA AND REPRESENT THE APPROXIMATE LOCATION BASED ON FIELD MEASUREMENTS. ACTUAL LOCATIONS AND EXTENTS MAY VARY FROM THOSE REPRESENTED HERE.
 - ELEVATION DATA PRESENTED IN SUMMARY TABLE IS TAKEN FROM NEXT AVAILABLE QUARTERLY CAPACITY SURVEY DATA OBTAINED AFTER PLACEMENT DATE OF ACM.
 - THIS DRAWING SHALL BE MAINTAINED IN COMPLIANCE WITH 40 CFR 61.154 (F), WHICH STATES THAT THE OWNER SHALL MAINTAIN, UNTIL CLOSURE, RECORDS OF THE LOCATION, DEPTH AND AREA, AND QUANTITY IN CUBIC METERS (CUBIC YARDS) OF ASBESTOS-CONTAINING WASTE MATERIAL WITHIN THE DISPOSAL SITE ON A MAP OR DIAGRAM OF THE DISPOSAL AREA.

No.	Date	Revision	By
1	11/11/2022	UPDATE W/ ADDITIONAL DISPOSAL INFO	AES

**ASBESTOS DISPOSAL LOCATIONS
 40 CFR 61.154 (f) RECORD KEEPING
 M-O-A LANDFILL**

Date Issued: 05/18/2020
 Date Surveyed:
 Designed By:
 Drawn By: ADB
 Checked By: AES
 Scale: 1" = 80'
 Original sheet size is 22x34

Location: PART OF SECTION 6
 T29N-R05E
 LOUD TOWNSHIP
 MONTMORENCY COUNTY
 MICHIGAN

Project Number:
 202240001.03

Sheet:
1