

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

N824826735

<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> Sandy Cunningham , Administrator		<b>ACTIVITY DATE:</b> 09/03/2014
<b>STAFF:</b> Rob Dickman	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Scheduled inspection of this Title V subject source.		
<b>RESOLVED COMPLAINTS:</b>		

Inspected this source as per ROP Number MI-ROP-N8248-2010. This ROP expires in April of 2015. Prior to entering the facility, it was noted that winds were light and out of the south. No odors were noted downwind of the facility.

This facility is subject to 40 CFR 60 Subpart WWW. Much of this subpart will not apply to a facility unless non-methane organic compound (NMOC) emissions are greater than 50 megagrams per year (Mg/yr). Compliance with this is determined through testing called Tier 2 testing. The last Tier 2 testing performed at this facility was in July of 2010, and indicated NMOC emissions of 6.82 Mg/yr. Emissions reported to MAERS for 2013 were 3.6 Mg/yr. Consequently, much of Subpart WWW and the ROP conditions associated with it will not apply. Following are the findings of the inspection based on currently applicable conditions:

#### **EULANDFILL<50**

As stated above, the only conditions that are applicable in this emission unit are those associated with the Tier 2 testing. This testing performed in July of 2010. All reporting associated with this testing has been completed and the facility has submitted annual NMOC emissions estimates (via MAERS) as required. All other conditions are not applicable until the 50 Mg/yr NMOC emissions threshold has been exceeded.

EULANDFILL - Municipal solid waste landfill with a design capacity that exceeds 2.5 million megagrams, and whose Tier I calculation indicates actual annual NMOC emissions in excess of 50 megagrams.

Tier II testing and modelling performed July of 2010 indicates the facility has emissions less than 50 megagrams annually. Specifically 3.6 Mg/yr in 2013.

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

I. EMISSION LIMITS – No emissions limits

II. MATERIAL LIMIT(S) – No material limits

III. PROCESS/OPERATIONAL RESTRICTIONS

If the landfill accepts asbestos-containing waste materials

There must be no visible emissions to the outside air during acceptance and placement of the asbestos containing material. The generator must notify the facility in advance that the waste is coming to the facility. The location where the waste is to be placed is surveyed in and mapped for not only north and west coordinates but also elevation. Waste is placed in the cell and immediately buried. This eliminates the possibility of any future opacity from and human contact with the material. This facility follows this procedure. Asbestos containing materials are scheduled ahead of time, immediately placed and buried upon arrival, and surveyed in and mapped.

Additionally, a natural barrier adequately deters access by the general public. A fence encompasses the facility and is adequately signed.

IV. DESIGN/EQUIPMENT PARAMETERS

The placement of gas collection devices shall control all gas producing areas, except as provided by the following:

Any segregated area of asbestos or nondegradable material may be excluded from collection. As described above, the facility does not have NMOC emissions such that collection is required. Therefore, this condition does not apply.

#### V. TESTING/SAMPLING – No testing or sampling requirements

#### VI. MONITORING/RECORDKEEPING

For all asbestos-containing waste material received, the permittee of the active waste disposal site shall:

Maintain waste shipment records that include the following information:

The name, address, and telephone number of the waste generator.

The name, address, and telephone number of the transporter(s).

The quantity of the asbestos-containing waste material in cubic meters (cubic yards).

The information in items i-iii was reviewed and appeared complete.

The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers. Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day, the presence of a significant amount of improperly enclosed or uncovered waste. Submit a copy of the waste shipment record along with the report.

No incidents of this nature were noted in the last 12 months.

The date of the receipt. This information was included on the manifesting of received material.

As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator. This is being performed.

Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record). No incidents of this nature were noted in the last 12 months.

The permittee 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 storage. As described above, this is being performed.

The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection. There was no waste excluded in the last 12 months.

The permittee shall furnish upon request, and make available during normal business hours for inspection by the AQD, all records required. Records were available at the time of inspection.

#### VII. REPORTING

1- 3. All semi-annual and annual deviation reporting has been completed in a timely manner. Review of this reporting is documented in MACES.

The permittee shall submit to the appropriate AQD District Supervisor, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities. The facility is currently open with no plan to close.

Notify the appropriate AQD District Office in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. There have been no incidents of this nature in the last 12 months.

VIII. STACK/VENT RESTRICTION(S) – There are no stack restrictions

IX. OTHER REQUIREMENT(S) – No other requirements

EUACTIVECOLLECTION – Active gas collection and control system pursuant to 40 CFR 60.752

The last Tier 2 testing performed at this facility was in July of 2010, and indicated NMOC emissions of 6.82 Mg/yr. Emissions reported to MAERS for 2013 were 3.6 Mg/yr. Consequently, active collection is not required.

Appendix 2, Schedule of Compliance

Pursuant to letters from EPA Region 5 dated August 4, 2011, the facility has been excused from complying with Appendix A as they met the obligations of EPA's voluntary audit criteria. Therefore this schedule and required installation of active gas collection does not apply until the facility reached the 50 Mg/year NMOC threshold in Subpart WWW.

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

NAME



DATE

9/4/14

SUPERVISOR

