

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

N824848908

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: 04/24/2019
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On April 24, 2019, Ms. Caryn Owens, Joe Scanlan, and Michael Conklin 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 2 miles south of County Road 487 and McMurphy Road intersection. This site is subject to the New Source Performance Standards (NSPS) for Municipal Solid Waste Landfills (40 CFR 60 Subpart WWW). This site is an area source of hazardous air pollutants (HAPs) and emits less than 50 megagrams (Mg) or more 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 appears to be in compliance with ROP MI-ROP-N8248-2015. 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:

EGLE met with Connie Gerrie of MOA when we first arrived at the site, and she assisted with onsite records. EGLE was also escorted around the facility by Mr. Doug Baker of MOA to observe landfill operations. The weather was mostly sunny and approximately 60 degrees Fahrenheit, with calm winds. The site consists of 86 acres with approximately 29 acres permitted for landfill use. The permitted area consists of a main building containing offices and a vehicle maintenance area, a maintenance building on the southern portion of the Property, a pump house building on the northwestern portion of the site, two leachate lagoons and pumping station, and an active landfill area for waste.

The leachate collected at the site is pumped from active Cells A and B into the leachate lagoons. The closed cells gravity feed into one of two 20,000-gallon underground storage tanks (USTs) that are manually pumped into the leachate lagoons. One of the USTs is for emergency purposes only. Approximately 12,000 to 15,000 gallons per week is pumped from the UST into the lagoons. The facility has the potential to use leachate evaporators, but the leachate evaporators are not used very often. Currently, the landfill hauls approximately 300,000 gallons per week of leachate offsite to a disposal well from the leachate lagoons.

The facility is claiming the following exemptions apply at the facility:

- Two 20,000-gallon USTs to hold leachate from closed portion of landfill meets exemption Rule 336.1285(2)(aa)
- Two leachate lagoons and associated collection equipment meets exemption Rule 336.1285(2)(aa)

Records Review:

EULANDFILL<50

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 design capacity) permit from the EGLE, since May 30, 1991, and therefore making the landfill subject to NSPS, 40 CFR Part 60, Subpart WWW.

- There are no applicable **Emission Limits, Material Limits, Process/Operational Restrictions, Design/Equipment Parameters, or Stack/Vent Restrictions** for EULANDFILL.
- **Testing/Sampling:** The facility has chosen to perform Tier 2 testing and LandGem modelling as the method of compliance to demonstrate NMOC emissions. The Tier 2 testing was performed on April 28, 2015. Testing and modelling demonstrated that the facility is well below the 50 Mg per year NMOC emissions rate.
- **Monitoring/Recordkeeping:** The facility is required to keep a record of changes to their design capacity. The landfill monitors and records the current amount of solid waste in-place and the year by year acceptance rates. AQD reviewed these records during the inspection. The company has recently applied for an expansion to begin filling Cell C of the landfill.
- **Reporting:** Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. The facility also submits NMOC emissions data per the MAERS reporting system.
- **Other Requirements:** The facility has included NMOC emissions projections which indicate the facility will never reach the 50 Mg/year NMOC threshold at current waste acceptance rates. 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. No landfill odors were present during the inspection.

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 field inspection in the area where asbestos containing waste material was deposited. It was noted the depth is not recorded while establishing the asbestos containing material location in the landfill. Ms. Gerrie and Mr. Baker indicated they will be purchasing a GPS and record a depth above sea level for the location of the asbestos containing material along with the location and amount of asbestos containing load in the cell. The facility does not receive a lot of asbestos containing material, but 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.
- **Design/Equipment Parameters:** As previously stated, all asbestos containing material cells buried in the landfill are mapped. The loads that contain 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. AQD requested that the depth of the load also be included on the future records. As noted on the records, any shipment received was covered immediately to minimize a chance of any friable material becoming airborne.
- **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 Creek

DATE 4/24/19

SUPERVISOR SN