



Clean Air Act Asbestos NESHAP Compliance Evaluation Inspection Report

Ada County Landfill

10300 N Seaman Gulch Road
Garden City, Idaho 83714

Inspection Date: November 7, 2024

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Attachments

Attachment 1	Inspection Digital Image Log
Attachment 2	Ada County Landfill Recent Waste Shipment Records
Attachment 3	Follow-up Photographs from Facility

I. Basic Facility and Inspection Information

Facility Location: Ada County Landfill
10319 Seaman’s Gulch Road
Boise, Idaho 83714

Mailing Address 200 West Front Street
Boise, Idaho 83702

Facility Contacts: Dylan Potter
Environmental Compliance Manager
Ada County Solid Waste Management
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FRS Number: 110018855041

SIC: 4953 – Refuse Systems

NAICS: 562212 – Solid waste Landfill

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Date of Inspection: November 7, 2024

Inspection Start/End Times: 10:58 AM – 1:04 PM

Inspection Notice: This was an unannounced inspection.

Were samples collected for this inspection? No

Were any sample results positive for asbestos? N/A

II. Purpose of Inspection

This was a partial compliance evaluation by the U.S. Environmental Protection Agency (EPA) Region 10. The purpose of this inspection was to determine compliance with the Clean Air Act (CAA), National Emission Standard for Asbestos (“asbestos NESHAP”) (40 CFR Part 61, Subpart M), which applies to renovation and demolition activities which may disturb asbestos at a “facility” as defined in the asbestos NESHAP. The asbestos NESHAP includes standards for active waste disposal sites that receive asbestos-containing waste material (40 CFR 61.154).

Inspector Gregory, EPA Region 10, led the inspection and was accompanied by Inspector Skeens, EPA Region 8.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

III. Compliance History

A review of EPA’s Enforcement and Compliance History Online (ECHO) database¹ showed Ada County Landfill has not had informal or formal enforcement actions in the last five years.

IV. Facility and Process Description

The following facility description is based on information provided by a facility representative in the opening conference as well as information on the facility’s webpage².

¹ See <https://echo.epa.gov/>.

² Ada County Landfill, <https://adacounty.id.gov/landfill/>

The Ada County Landfill (“the landfill”) is a municipal solid waste landfill on a 2,700-acre property. The landfill is owned and operated by Ada County. The landfill consists of two cells- Hidden Hollow Cell and the North Ravine Cell. The Hidden Hollow Cell encompasses an area of approximately 120 acres with design capacity of 16 million cubic yards. The North Ravine Cell encompasses an area of approximately 260 acres and was designed to have a final capacity of 80 million cubic yards and an active life of 90 years based on growth patterns and modeling. The North Ravine Cell has been accepting waste since 2006.

The Department of Solid Waste Management oversees the management of the landfill and consists of three divisions: Solid Waste, Environmental Waste, and Hazardous Waste.

- Solid Waste Division oversees daily operations, diversion programs, and landfill activities, working directly with onsite contractors in the daily receipt, placement, and cover of the waste into the landfill.
- The Environmental Waste Division oversees operation and maintenance of the landfill gas extraction system, leachate collection and control systems, and other environmental facilities located at the Ada County Landfill. This division is also responsible for ongoing monitoring of all emissions and creating reports regarding systems function and operation.
- The Hazardous Waste Division oversees operation and maintenance of the county’s hazardous materials collection program.

Ada County Landfill states they accept three types of waste types:

- Ordinary waste such as food waste, household waste, construction/demolition waste, and yard waste.
- Waste Diversion and Recycling including appliances, metal, electronics, clean wood, cardboard, and tires.
- Hazardous waste from Ada County residents and Very Small Quantity Business Generators including substances flammable, combustible, corrosive, explosive, reactive, or toxic. Asbestos is included in hazardous waste.

V. Pre-Inspection Observations

We went directly to the facility. No observations were made prior to the inspection.

VI. Inspection Elements/Order

The inspection team was escorted by Dylan Potter, Environmental Compliance Manager, during the facility walkthrough. The inspection included a thorough walkthrough of the facility and taking photographs/videos. A digital photo log is Attachment 1 to this report.

A. Entry and Opening Conference

Inspector Skeens and I arrived at the scale building for the landfill at 10:58 AM and let the attendant know we were with the EPA to conduct an unannounced asbestos NESHAP inspection. The attendant gave us a venter pass and directed us to a nearby administrative building. Inspector Skeens and I entered the administrative building at 11:02 AM and introduced ourselves to Robert Amieva, Administrative Assistant. Mr. Amieva stated he would let the Environmental Compliance Manager know of our arrival and that we are welcome to wait in the lobby. Dylan Potter, Environmental Compliance Manager, met Inspector Skeens and I in the lobby where we introduced ourselves, stated the visit's purpose, and presented our credentials to Mr. Potter.

The opening conference began at approximately 11:14 AM and was conducted within Mr. Potter's office. Present at the opening conference was Mr. Potter, Inspector Skeens, and myself. I asked Mr. Potter background questions regarding the landfill including who owns the landfill and when operations began. Mr. Potter stated the following regarding the landfill:

- Ada County is the current owner of the landfill.
- Ada County purchased the landfill property in 1972 and the active cell during that time was the Hidden Hollow Cell.
- The Hidden Hollow Cell is an older designed cell, unlined, and was capped and closed in 2017. The Hidden Hollow Cell is approximately 120 acres.
- The new, active cell is North Raven Cell and will be approximately 260 acres once fully built. The cell has been active since 2006.
- North Raven Cell is projected to fill in 2068, although, the landfill is seeing higher level of waste volume.

I asked questions specific to asbestos including what types of asbestos shipments the landfill will accept and where they place asbestos waste. Mr. Potter provided the following:

- The landfill accepts commercial and residential asbestos waste, however, the majority (~95%) is from commercial operations.
- Residential asbestos waste arrives approximately every few months from individuals.
- Asbestos waste is placed in the south edge of the North Raven Cell using GPS location to avoid gas lines and liner.
- The North Raven Cell is not a dedicated cell for asbestos; however, asbestos is placed within the same general area of the cell.

I asked for Mr. Potter to describe the drop-off procedure for waste transporters with asbestos. Mr. Potter described the drop-off procedure:

- The waste transporter gives a 1-day notification to the landfill and needs a Waste Shipment Record (WSR).
- The scale house provides the waste transporter an "asbestos disposal certificate" (see photograph PB070060).

- The waste transporter will pull aside of the road and await a landfill employee to inspect the waste, help with paperwork, and lead the transporter to the disposal location.
- The disposal GPS coordinate is recorded on the top-right of the asbestos disposal certificate.
- The landfill maintains the GPS location records of all asbestos waste disposal beginning in the year 2001.

When asked about discrepancies or issues with waste transporters, Mr. Potter stated they do occasionally have discrepancies and approximated one per month. Mr. Potter elaborated that generally any discrepancies are dealt with on-site and provided an example such as the waste transporter did not mark the correct number of waste bags. The landfill will have the waste transporter revise the WSR for the correct number of waste bags. Additionally, Mr. Potter gave an example of a larger discrepancy, where the landfill may turn away a waste transporter, as the asbestos waste bags not properly bagged. The landfill does maintain an internal spreadsheet of discrepancies to track recurrent issues and the landfill will educate waste generators/transporters about proper labelling of waste bags, however, will not necessarily turn away a transporter if all bags are not labelled correctly. Discrepancies are noted in either the WSR, asbestos disposal certificate, and/or the landfill's internal spreadsheet.

I asked about the volume of asbestos waste the landfill receives. Mr. Potter stated he could provide the information if he looked through the landfill's records and data, however, he did not know the exact number off the top of his head. He estimated 5 cubic yards per week or about 6 truckloads a week.

I asked if the landfill maintains signage to inform of areas containing asbestos and Mr. Potter stated there is signage of asbestos in appropriate areas.

Inspector Skeens asked Mr. Potter if we could review a few recent WSRs and Mr. Potter provided the most recent WSRs. Inspector Skeens and I reviewed the WSRs and did not find any visible issues with the forms. Mr. Potter stated he would e-mail Inspector Skeens and I ten of the recent WSRs.

The opening conference concluded at 12:09 PM.

B. Facility Walk-Through

The facility walkthrough began at 12:15 PM. Mr. Potter escorted Inspector Skeens and I in a vehicle to tour the landfill and the active asbestos disposal location. En route to the active asbestos disposal areas Mr. Potter stated there is currently four stages to the North Raven Cell with 1 being the oldest stage and 4 being the active stage. As we neared the active asbestos disposal area there were visible signs warning of asbestos (see photograph PB070064).

We arrived at the active asbestos disposal location at approximately 12:30 PM and an asbestos waste disposal was in-progress. The in-progress disposal consisted of a metal trailer which deposited a burrito wrapped waste (see photograph PB070065). The area included several piles of soil covering previous asbestos waste disposal and one soil pile which was used to cover

future waste disposals. Inspector Skeens and I walked around the soil piles covering previous asbestos waste disposals and found three partially uncovered asbestos waste bags (see photographs PB070067, PB070068, and PB070069). Mr. Potter stated the waste bags were uncovered due to a recent rain event and the landfill would re-cover the bags with soil. The uncovered waste bags appeared to be properly bagged, contained the waste and in good condition. Inspector Skeens and I then went to observe the on-going asbestos waste disposal. The waste transporter was accompanied by landfill staff, the waste was wrapped and included warning signage of asbestos waste. The landfill began to cover the asbestos waste with soil immediately after the transporter deposited it using a front loader (see photographs PB070071 and PB070072).

The walkthrough ended at approximately 12:45 PM and Mr. Potter, Inspector Skeens, and I returned to the administrative building parking lot.

C. Closing Conference

At 12:49 PM, Mr. Potter, Inspector Skeens, and I convened in the administrative building parking lot to discuss the inspection and conduct the closing conference. I led the closing conference and summarized the parts of the facility we had visited during the inspection and our observations related to asbestos NESHAP. I went through my inspection notes and specifically mentioned our walkthrough included an on-going asbestos waste disposal and I noted the recent load had asbestos signage, properly wrapped, and was covered immediately. I identified the following as a potential compliance concern during the closing conference:

1. There were three partially uncovered asbestos waste bags.

Inspector Skeens stated that if the landfill re-covers the asbestos waste bags to take a photograph and e-mail to Inspector Skeens and I. Mr. Potter agreed to send photographs once the landfill re-covered the asbestos waste bags and confirmed he would additionally send the 10 recent WSRs.

Inspector Skeens and I departed the facility at 1:04 PM.

VII. Post Inspection Activities

On November 8, 2024, Mr. Potter provided 10 of the most recent WSRs the landfill received (Attachment 2) and stated he underestimated the volume of asbestos waste the Landfill receives each month. The landfill receives approximately 200 cubic yards of asbestos waste on average per month. Mr. Potter followed-up with another e-mail on November 12, 2024, and provided photographs depicting additional soil added to the bags that were found to be uncovered during the on-site visit (Attachment 3).