



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET S.W
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Mr. Patrick Dunson
City Engineer, Engineering and Environmental Services, City of Montgomery
North Montgomery Municipal Solid Waste Landfill
115 Division Street
Montgomery, Alabama 36104
pdunson@montgomeryal.gov

Dear Mr. Dunson:

Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, South Air Enforcement Section, for the inspection conducted at the North Montgomery Municipal Solid Waste Landfill facility, located in Montgomery, Alabama, on March 15, 2022.

If you have any questions, you can contact me at (404) 562-9134, or by email at taylor.kevin@epa.gov.

Sincerely,

Taylor,
Kevin

Digitally signed by
Taylor, Kevin
Date: 2022.05.24
10:58:54 -04'00'

Kevin Taylor
Environmental Engineer
South Air Enforcement Section

Enclosure

ENCLOSURE A
INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: North Montgomery Municipal Solid Waste Landfill

Location (Address): 115 Division Street
Montgomery, Alabama 36104

Inspection Date: March 15, 2022

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

ICIS-Air Number: AL0000000110100078

EPA Investigator(s)/Inspector(s):

1. Kevin Taylor, Environmental Engineer
2. Sydnee Adams, Environmental Engineer
3. Andrew Mills, Environmental Engineer
4. Katelyn Bergl, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

1. John Robert Gill, Environmental Engineer
Alabama Department of Environmental Management (ADEM)

Person(s) Contacted at Facility (Name and Title):

1. Radonda May, Assistant Superintendent
North Montgomery Landfill, City of Montgomery
2. Booker T. Johnson, Construction Operator
North Montgomery Landfill, City of Montgomery
3. Jon K. Howard, Environmental Scientist
North Montgomery Landfill, City of Montgomery
4. Patrick Dunson, City Engineer
North Montgomery Landfill, City of Montgomery
5. Adam George, P.E., Associate Operations Director/Senior Engineer
Environmental Consulting & Technology, Inc. (ECT)
6. Joe Adams, P.E., Project Manager/Engineer,
CDG Engineers & Associates

7. Gabby Sanders, P.E., Project Engineer,
CDG Engineers & Associates

Report Prepared by: Kevin Taylor

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Municipal Solid Waste Landfill
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Title V Operating Permit No. 209-0078
3. Air permit issuance date.	06/24/2016
4. Air permit expiration date.	06/23/2021
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs) Volatile Organic Compounds (VOCs)
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 CFR Part 60 Subpart WWW NSPS – Municipal Solid Waste Landfills 40 CFR Part 63 Subpart AAAA MACT - Municipal Solid Waste Landfills
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Gas Collection and Control System (GCCS)
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Gas generated from the decomposition of waste is sent to a flare.

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

North Montgomery Municipal Solid Waste Landfill receives, manages, and disposes of solid waste, including, but not limited to, municipal solid waste, commercial waste, and industrial waste. Waste is accepted, compacted, and covered soil or other cover materials daily. Waste

decomposition produces landfill gas and leachate, both of which are managed through collection and control systems. Gas generated from the decomposition of waste is collected by a gas collection and control system (GCCS) and burned by a flare.

III. INSPECTION ACTIVITIES

Activity	Yes	Comment
	No	
	NA	
Opening Meeting		
1. Date and time entered the facility.	Yes	The EPA Region 4 inspectors entered the facility on March 15, 2022, at 1:20 pm (CDT).
2. Credentials presented to facility personnel (include name and title).	Yes	Upon arrival, EPA Region 4 inspectors presented their EPA credentials to the facility personnel.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	The EPA Region 4 inspectors held an opening meeting with the North Montgomery Landfill personnel during which the purpose and objectives of the inspection were explained.
4. Discussed safety issues.	Yes	The EPA inspectors discussed with the facility the personal safety equipment needed to conduct the inspection, emergency procedures for the facility and COVID-19 safety protocols required by EPA and the facility.
5. Discussed which records to be reviewed.	Yes	Records were requested during the inspection and were initially being gathered while the inspection was being conducted. There was also a request for a copy or electronic submittal of the records, if possible, based on Covid-19 safety protocols. Due to the risk of Covid-19, the EPA inspectors wanted to limit the amount of time spent reviewing the records indoors. At the close of the

		inspection, the facility stated that an official request for any records was preferred.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	EPA inspectors discussed the overall inspection plan, which included looking at the flare and monitoring ground level methane around the perimeter and across the landfill.
7. Discussed facility policy regarding photographs or video (if applicable).	Yes	EPA inspectors indicated that videos may be taken with the infrared camera. If a video was taken, EPA would give the facility prior notice of the recording and ask that the facility identify any proprietary/CBI concerns before any video was taken to help EPA assess the need for the video. All videos taken during the inspection would be sent to the facility.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	Yes	EPA inspectors communicated the use of the infrared camera, the toxic vapor analyzer (TVA) and GPS unit for location identification.
9. Discussed CBI.		EPA inspectors requested that anything that the facility considers to be CBI be identified. The facility would also have an opportunity to review the EPA inspection report and any recorded video for CBI content prior to finalizing it. Any information identified as CBI would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed and the time period reviewed.	No	Records were requested during the inspection and were initially being gathered while the inspection was being conducted. There was also a request for a copy or electronic submittal of the records, if possible, based on Covid-19 safety protocols. Due to the risk of Covid-19, the EPA inspectors wanted to limit

		the amount of time spent reviewing the records indoors. At the close of the inspection, the facility stated that an official request for any records was preferred.
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Yes	
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector.	N/A	

Identify the permit limit (if applicable). An attachment may be used for a large amount of information.		
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Yes	Waste gas generated from the decomposition of waste in the landfill is collected by a gas collection and control system (GCCS). The waste gas is sent to a utility/candlestick flare for destruction. At the time of the inspection, the flare was operating and was observed using the infrared camera.

15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	Yes	Waste gas generated from the decomposition of waste in the landfill is collected by a gas collection and control system (GCCS). During the inspection, there were recorded instances of leaks and emissions using both the TVA and the infrared camera. See Attachment A and B.
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission	No	

points, or non-permitted construction activities observed. (if yes, describe in the comments field).		
20. Were any visible emissions observed? (if yes, identify the location and equipment).	No	There were no emissions which were visible to the naked eye. However, the emissions that were observed were volatile organic emissions which are not normally detectable by sight but were observed using the TVA and/or the infrared camera. There were also emissions observed percolating from various areas that had standing water from recent rainfall. The bubbling in these areas was an indication of gases being emitted. The volatile organic emissions were then documented with the TVA and/or the infrared camera. See Attachment A and B.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	No	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the	Yes	See Video Log Attachment A

date and time the video was recorded) and videos to this report.		
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	Yes	See TVA Reading Log Attachment B
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	No	
Closing Meeting		
28. Conducted a closing meeting.	Yes	EPA Region 4 inspectors conducted a closing meeting on March 17, 2022, at 4:30 CDT with the facility personnel and the participation of the ADEM inspector.
29. Summarize any additional information needed, if applicable?	No	No additional information was requested of the facility at the time of the inspection since the facility requested a formal information request from EPA.

30. Accept a declaration of CBI, if applicable?	No	Although the CBI procedures were explained in the opening meeting and at the start of the inspection. A CBI declaration was not made at the time of the inspection. The facility was advised that an inspection report and all recorded videos and pictures would be sent to them for a CBI review following the inspection.
31. Discussed observations.	Yes	EPA inspectors discussed the observations made during the inspection. This included the specific areas of elevated TVA readings and/or infrared video recordings at the extraction well sites, leachate collection and clean out areas, and the emissions recorded along the surface of the landfill cover.
32. Discussed next steps, if applicable?	Yes	The EPA inspectors stated that an inspection report and the submission of all recorded videos and pictures would be the next step in the process.
33. Date and time inspection concluded.	Yes	The inspection concluded on March 17, 2022, at 4:30 CDT.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: Taylor, Kevin Digitally signed by Taylor, Kevin
Date: 2022.05.25 06:41:03 -04'00'

EPA Supervisor Signature & Title Groendyke, Todd Digitally signed by Groendyke, Todd
Date: 2022.05.24 15:21:48 -04'00'

Date Report Finalized: _____

Project Name: North Montgomery Municipal Solid Waste Landfill

ICIS/Project No.: AL0000000110100078

Document Number: AEBFORM-012-R0

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Effective Date: May 14, 2019

ATTACHMENTS

1. Attachment A: Video and Photo Log
2. Attachment B: TVA Recorded Readings Log