UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

Clean Air Act
Asbestos NESHAP
Compliance Inspection Report

Republic Services Roosevelt Regional Municipal Solid Waste Landfill

500 Roosevelt Grade Road
Roosevelt, Washington

Inspection Date: March 9, 2022

Report Author Signature: ALYSON SKEENS Digitally signed by ALYSON SKEENS Date: 2022.05.09 09:48:22 -07'00'

Alyson Skeens, Environmental Engineer, Region 10

Peer Review Signature: JOHN PAVITT Digitally signed by JOHN PAVITT Date: 2022.05.09 10:45:22 -08'00'

John Pavitt, Air Compliance Inspector, Region 10

Section Chief Signature: DERRICK TERADA Digitally signed by DERRICK TERADA Date: 2022.05.09 14:17:47 -07'00'

Derrick Terada, ATES Acting Section Chief, Region 10

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Attachments

1. Facility and Inspection Information

Facility Owner:	Republic Services Roosevelt Regional Municipal Solid Waste Landfill 500 Roosevelt Grade Road Roosevelt, Washington 99356 Art Mains, Washington Environmental Manager (509) 581-0466 AMains@republicservices.com Gregery Bringle, Former Division Manager (509) 581-0464 GBringle@republicservices.com Josh Shaw, General Manager JShaw2@republicservices.com
FRS ID Number:	110001917436
ICIS-Air ID Number:	WA0000005303900024
NAICS:	Republic Services Landfill 562212 – Solid Waste Landfill
U.S. EPA Inspectors:	Alyson Skeens Enforcement and Compliance Assurance Division (ECAD) Air and Toxics Enforcement Section (ATES) U.S. EPA Region 10 (R10) (206) 553-5139 Skeens.alyson@epa.gov John Pavitt ECAD/ATES U.S. EPA R10 (907) 271-5083 Pavitt.john@epa.gov Kim Farnham ECAD/ATES U.S. EPA R10 (206) 553-6697 Farnham.kim@epa.gov
State/Local Inspectors:	Jennifer Caraway Compliance & Enforcement Officer Lead-Based Paint Program

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Jennifer.caraway@commerce.wa.gov

Date of Inspection: March 9, 2022

Date of Report: May 2, 2022

Inspection Start Time: 4:04 PM

Inspection End Time: 5:50 PM

Inspection Notice: Announced

Scheduled dates asbestos removal: N/A

Scheduled dates demolition/renovation: N/A

Were samples collected for this inspection? No

Were any sample results positive for asbestos? N/A

2. Introduction

The purpose of this inspection was to determine compliance with the Clean Air Act (CAA), National Emission Standards for Hazardous Air Pollutants 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. [1]

The inspection was led by Alyson Skeens, EPA R10 and supervised by John Pavitt, EPA R10. Also participating for on-the-job training was EPA R10 inspector Kim Farnham.

Republic Services' website for the Roosevelt Regional Municipal Solid Waste Landfill (Roosevelt Landfill) states that it has a permitted capacity of 120 million tons over 40 years. Waste is brought to the landfill by truck and railway. Roosevelt landfill is permitted to accept:

> Residential, commercial, and industrial waste streams including municipal solid waste, construction and demolition debris, wood wastes and petroleum contaminated soils. [They] accept municipal incinerator ash in [their] double-lined ash monofill. [They] do not accept hazardous waste or dangerous waste. [2]

[1] See 40 CFR §61.141. *Facility* means any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, or building containing condominiums or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units); any ship; and any active or inactive waste disposal site.
[2] https://www.republicservices.com/roosevelt-landfill

According to the Roosevelt Landfill website, Republic Services states that it provides intermodal containers which they say are ideal for several types of waste including asbestos-containing waste materials (ACWM).

The inspectors confirmed during the site visit that that Roosevelt Landfill does take ACWM. The Roosevelt landfill does not have a dedicated section of the landfill for asbestos. ACWM is accepted in the morning and buried under non-asbestos containing waste. Facility representatives stated that the burial location of all asbestos loads are GPS marked and buried under approximately six feet of compacted waste by close of business that day.

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.

3. Compliance History

A review of EPA's Enforcement and Compliance History Online (ECHO) database[3] showed Roosevelt Landfill has no reported violations of CAA requirements in the last three years, and no formal or informal enforcement actions related to CAA requirements in the last five years. ECHO reports that there were 12 CAA compliance monitoring activities such as State inspections and State review of facility reports in the last five years related to the facility's air permit. The ECHO database shows the facility was reported as being in noncompliance with one or more Clean Water Act (CWA) requirements in 12 of the last 12 quarters (three years).

4. Environmental Justice Information

EPA's Environmental Justice Screening and Mapping Tool (EJScreen)[4] showed Roosevelt Landfill in Roosevelt, Washington is not in an area with an index over the 80th percentile any EJ indices.

5. Records Review

Waste Shipment Records

The asbestos NESHAP requires the owner or operator of a project subject to the NESHAP to maintain Waste Shipment Records (WSR) for each load of waste transported from the job site which and must be provided to the landfill for review with each load. (61.150(d)(1) and (2)) The WSR form must include details including but not limited to the contents of the load, quantity of waste, the job site where it was generated, contact information for the generator and transporter and the landfill destination. (40 C.F.R. §61.150(d)(1))

[3] See https://echo.epa.gov/. For more information on EPA's EJ Screen Indexes, see EJSCREEN home page.
[4] See EJSCREEN: Environmental Justice Screening and Mapping Tool | US EPA

EPA requested WSR records from the facility as part of this inspection. On March 23, 2022, Roosevelt Landfill emailed Inspector Skeens eight sets of zip files with half for August 2021 and the other half for May 2020, as requested. Inspector Skeens was unable to open these electronic records and on April 16, 2022, revised the request to include just the first 10 WSRs for each of the above months. The facility submitted the requested records in a pdf format the next day. The below table summarizes these records. A more detailed summary of the WSRs can be found in attachment 2 of this report.

WSR Data Set	Earliest Drop Off	Latest Drop Off	Number of WSRs	Number of Containers Identified
May 2020	May 4, 2020	May 26, 2020	72	9894 bags, 10 barrels and 22 wraps
August 2021	August 16, 2021	August 27, 2021	66	1470 bags, 2 doors, 10 wraps and 7 packages

Records of the 138 WSRs show that information required by the asbestos NESHAP was not consistently provided. Records reviewed show dozens of examples of records lacking details such as the number of waste containers delivered, quantity of waste, or signatures. Some information was illegible. The friability of the asbestos waste materials was sporadically filled in. The table below summarizes this information. These percentages were compared to the total number of WSRs.

WSR Data Set	Friable	Non-friable	Not Listed
May 2020	4%	4%	92%
August 2021	18 %	14%	68%

Both months of WSRs data showed the use of a 2nd transporter was common. The most used 2nd transporter was Rabanco Transfer out of Seattle, Washington. Republic Services out of Ferndale, Washington was the second most used 2nd transporter. This can be summarized in the table below.

WSR Data Set	2nd Transporter listed	Rabanco	Republic Services - Ferndale
May 2020	88%	94%	0%
August 2021	65%	58%	26%

The column "2nd transporter listed" was calculated using total number of WSRs. The percentages for Rabanco and Republic Services – Ferndale were found taking by percentage of the WSRs with a 2nd transporter listed.

The abatement company with the most drop offs for August 2021 was CAZ Environmental. In May 2020, Affordable Environmental Inc. and One-Step Environmental Abatement had the most drop-offs.

There were no discrepancies listed on the WSRs from both data sets.

Landfill Maps

EPA requested landfill maps during this inspection which show the location of asbestos waste disposal. On March 23, 2022, Roosevelt Landfill emailed Inspector Skeens two maps (Attachment 5 and 6). The 2020 and 2021 maps each depict the location ACWM.

6. Inspection Elements/Order

Pre-Inspection Observations

At 2:45 PM on the day of the inspection Inspector Skeens called Roosevelt Landfill's main office from the road to ensure a facility representative would be able to meet the inspectors on site. Inspector Skeens spoke with Christine Watson about this, who said she would need to call the Division Manager, Greg Bringle, to see if Roosevelt Landfill would still be open when the inspectors arrive. Ms. Watson confirmed Mr. Bringle would be present when the inspectors arrived. The call ended shortly after.

Entry and Opening Conference with Facility Representatives

The EPA and State Inspectors arrived to Roosevelt Landfill around 4:04 PM and were greeted by Mr. Bringle. After presenting EPA's credentials, the inspectors asked Mr. Bringle to describe how ACWM was delivered to the landfill. Mr. Bringle said typically 99% of ACWM comes in by railway.

Mr. Bringle provided an overview of landfill operations. He explained that Roosevelt Landfill is built on a hill that is on a much larger hill. The railway delivers waste at the bottom of the main hill then the 24-foot containers are driven up to the landfill. These containers are staged at the bottom of the second hill just behind where the main office. Mr. Bringle explained that Roosevelt Landfill was originally built in 1995 and is making plans for a vertical expansion that could add up to 150 years of life to the landfill. Roosevelt hires private environmental companies to design additions to the landfill. Roosevelt Landfill is on their 22nd cell and has approximately 80 years of service left. Mr. Bringle also said that Roosevelt landfill is one of the largest in the nation.

Facility Walk-Through

Around 4:16 PM Mr. Bringle gave the inspectors a tour of the landfill. The inspectors asked if there was a designated area for asbestos. Mr. Bringle said where asbestos was buried was designated daily based on amount and fill layers available. Mr. Bringle said Roosevelt Landfill received approximately 8,000 tons total of waste per day. He said typically, the received waste is non-friable construction and demolition waste. Of the total amount of waste, a small percentage of it is asbestos. When asbestos is received the location of the waste is marked with GPS coordinates. Locations are reported to the front office daily. The Roosevelt Landfill's asbestos waste tracking sheet is updated bi-weekly by the front office, he said.

Mr. Bringle showed the inspectors a cell being actively filled and a new cell where construction had just completed. The inspectors asked how the new cell would be filled and if asbestos would be placed in the area. Mr. Bringle said when the first 2-3 feet of new cells are filled the material laid down is limited to "non-pokey" debris. This layer does not have construction and demolition (C & D) waste place in it. Bulky items are removed from non-C & D waste. Mr. Bringle said they do this to prevent the liner from being punctured. This layer is not compacted. The next layer is composed of approximately 6 feet of compacted debris. This layer also excludes C & D waste. Mr. Bringle said Roosevelt Landfill has experienced workers and they know how to properly fill new cells.

The inspectors noticed tall fences on wheels close to the working face of the landfill and asked Mr. Bringle about them. Mr. Bringle said Roosevelt Landfill has issues with strong winds with it being worse down in the ravine. Wind fences are used to help trap flying debris. Roosevelt Landfill employs approximately 10 workers to help pick up litter, he said. Mr. Bringle said Roosevelt Landfill has guidance in place to prevent ACWM from being dispersed by the wind. Justin Ramsay, Landfill Operation Manager, joined Mr. Bringle in giving the facility tour.

The inspectors asked Mr. Bringle how ACWM was buried. Mr. Bringle said their methods depended on the quantity of ACWM received. There are 3 methods used: place the ACWM against a berm, make a toe into the berm, or make a trench. Once the ACWM is placed workers tag the GPS location and use an iPad to track the data, he said. After the ACWM is placed and GPD tagged it is covered with other waste throughout the day. If the containers are filled with one large burrito, then the container is brought to the cell, dumped and buried in place. Occasionally, the containers are filled with a lot of smaller bags and those can be moved to more ideal convent locations to be buried. Mr. Bringle added that friable asbestos is being dumped in an older cell at the top of the second hill.

The inspectors asked if the general public is able to dispose of ACWM. Mr. Bringle said in order for ACWM to be dropped off Roosevelt Landfill must be notified at least 24 hours in advanced. The transporter must have a profile and the load must be within the scope of the profile. The profile will track what is in the load, the quantity, and the GPS location of there the load was placed. Mr. Bringle said Roosevelt Landfill did not allow public access for asbestos due to these rules.

The inspectors asked Mr. Bringle when Roosevelt Landfill opens for drop offs. He said loads are received around 6 am then around 7 am non-ACWM loads from the public are received. The inspectors asked where the waste was coming from. Mr. Bringle said waste was received from a large area. It arrives up and down the I-5 corridor, some will come from California and ash from the Spokane incinerator. Mr. Bringle said he has a daily 5 AM call with operations where he learns how much ACWM is expected to arrive for the day, if any.

The inspectors asked what happened to the railcars that are unable to be emptied the day of arrival. Mr. Ramsay said the 24- foot storage containers are stored at the bottom of the landfill if there is not enough trash to bury the ACWM by the end of the day. The containers with ACWM are segregated from the other containers with the doors facing in towards each other. All containers are labeled that they contain asbestos and are locked, he said.

The inspectors asked what type of signage for asbestos was placed around Roosevelt Landfill. Mr. Bringle said he thought there were some signs out front at the bottom of the main hill. Mr. Ramsay said each container when delivered has a warning sign and is removed once emptied. The inspectors asked how much coverage was placed on ACWM by the end of day. Mr. Bringle said that is varies, based on the load of ACWM but it will be covered with in hours.

Sampling

The EPA inspectors did not collect samples for this inspection. Asbestos sampling results were not requested from the facility representatives

Closing Conference

The tour of the landfill ended around 5:30 PM at the main office. Inspector Pavitt asked if Roosevelt Landfill had a designated dumping area for asbestos. Mr. Bringle said that it depends on the loadout's friability. All of the friable ACWM is brought in by train and placed separately from other ACWM. Mr. Bringle also said that all ACWM are GPS tagged. The tracking data for ACWM includes depth, location and amount, he said. The inspectors asked Mr. Bringle if the public dropped off ACWM. He said he was not aware of public drop-offs for ACWM. He said that Roosevelt Landfill conducts an annual flyover of the landfill. The landfill uses third party consultants (Terracon) to map the data, he said. (Attachment 5 and 6).

Inspector Skeens advised the facility that they can claim information provided during the inspection is Confidential Business Information and asked if there was anything observed today was CBI. Mr. Bringle said no. Inspector Skeens left a copy of the EPA' small business resource sheet.

Inspector Skeens asked if the facility representatives had any questions for the EPA inspectors. They said they did not. The inspectors left the facility at about 5:50 PM.