



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

June 24, 2015

Ms. Mary Ann Harrington, Chairperson
Delta County Board of Commissioners
310 Ludington Street
Escanaba, Michigan 49829

Dear Ms. Harrington:

The locally approved amendment to the Delta County Solid Waste Management Plan (Plan Amendment) received by the Department of Environmental Quality (DEQ) on November 22, 2014, is hereby approved with modifications. The Plan Amendment required modifications that were sent to the Delta County Designated Planning Agency (DPA) contact, Mr. Peter Van Steen on April 14, 2015. The approval of the modifications dated, May 6, 2014, was received from the DPA on behalf of Delta County.

Based upon the intent of the County, the following modifications were made to the Plan Amendment:

Page II-8, Facility Description, Escanaba Paper Company, the "Total area of facility property" identifies 2060 acres; however, based upon a review of the facility's restrictive covenant and confirmation from Mr. Todd Schmidt, Escanaba Paper Company, this amount should be 1960 acres. Therefore, the "Total area of facility property" shall be changed to 1960 acres. Additionally, the County intended to allow Escanaba Paper Company to expand throughout its entire property; however, the Amendment only identified 132.4 acres, under the "Total area sited for use." Therefore, the "Total area sited for use" acres shall be changed from 132.4 acres to 1960 acres. This change also applies to Page III-10 as well.

Page III-34, Siting Review Procedures, Siting Criteria and Process, first bulleted item does not identify the changes that were made in the Plan Amendment that was approved on, January 16, 2007. To alleviate any confusion, this item shall be changed to reflect those updates as follows:

Expansions of the Delta Landfill facility located in Section 22, **Section 21, and the South half of Section 15**, Township 39 North, Range 23 West, Delta County, is permitted.

Page III-34, Siting Review Procedures, Siting Criteria and Process, second bulleted item states the following, "Expansions of and/or changes in disposal area types to include other non-Type II wastes at the Escanaba Paper Company landfill facility located...are permitted." The term "non-Type II wastes" is not defined and does not clearly identify the County's intent for this facility and should be changed to a definable waste type.

Also, based upon conversation between Mr. Peter Van Steen, County DPA and Ms. Christina Miller, DEQ, the County intended to allow the Escanaba Paper Company landfill to get a permit for a change or an additional waste disposal area type only for waste

types that were generated on the facility property, including waste generated from any business that is located on their facility property. The language identified above does not limit the facility as the County intended.

Further, the County intended to allow Escanaba Paper Company to expand throughout its entire property, which as noted in the second paragraph of this letter, is 1,960 acres.

Based upon the above areas of concern and to clearly identify the County's intent this sentence shall be changed to the following:

"Expansions of and/or changes in disposal area types shall only include other industrial waste types and/or construction and demolition waste generated at the facility property, up to the 1960 acres identified on the facility description page under the "Total area sited for use", at the Escanaba Paper Company landfill facility located in Sections 25 and 36, Township 40 North, Range 23 West are permitted."

Further, the County requested to identify the current disposal rate amount found on page II-11 of the Plan Amendment, which should have been listed as \$57 per ton at the Delta County Landfill and not \$48 per ton. Therefore, the disposal rate amount shall be changed to \$57 per ton per this request.

Upon approval by the DEQ, the Plan Amendment also makes the following changes:

- Updates the Data Base section with current and projected waste volumes
- Updates the facility description pages for the Escanaba Paper Company landfill and includes additional waste types if/when the facility is permitted as a construction & demolition (C&D) landfill.
- Updates the Solid Waste Collection and Transportation Infrastructure to reflect the current structure.
- Updates the Evaluation of Deficiencies and Problems in the existing solid waste system.
- Updates the Solid Waste Management Alternatives; specifically the information pertaining to the waste generated at the Escanaba Paper Company landfill.

The DEQ would like to thank Delta County for its efforts in addressing its solid waste management issues. If you have any questions, please contact Ms. Rhonda S. Oyer, Chief, Sustainable Materials Management Unit, Solid Waste Section, Office of Waste Management and Radiological Protection, at 517-284-6591; oyerr@michigan.gov; or DEQ, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Bryce Feighner, P.E., Chief
Office of Waste Management and
Radiological Protection
517-284-6551

cc: Senator Tom Casperson
Representative Ed McBroom
Mr. Peter Van Steen, Central Upper Peninsula Planning & Development Commission
Mr. Dan Wyant, Director, DEQ
Mr. Jim Sygo, Deputy Director, DEQ
Ms. Maggie Pallone, Legislative Affairs, DEQ
Mr. Phil Roycraft/Ms. Carolyn St Cyr, DEQ
Ms. Rhonda S. Oyer, DEQ
Mr. Steve Sliver/Ms. Christina Miller, DEQ\Delta County File



Central Upper Peninsula Planning And Development Regional Commission

2950 College Ave., Escanaba, MI 49829 • www.cuppad.org • cuppad@cuppad.org
Phone: 906-786-9234 • Fax: 906-786-4442 • 800-562-9828

May 6, 2015

Ms. Christina Miller
Solid Waste Section
Department of Environmental Quality
PO Box 30241
Lansing, MI 48909-7741

Dear Christina:

We received the letter dated April 14, 2015 regarding the recent amendment submitted by Delta County to amend its Solid Waste Plan. Your comments were shared with officials of Escanaba Paper Company who suggested some minor editorial changes.

At a recent meeting of the Delta County Board of Commissioners (May 5, 2015), the Commissioners reviewed your comments and concurred with your recommendations as presented with the slight editorial changes as suggested by Escanaba Paper Company.

The current disposal rate is \$57.00 per ton at the Delta Landfill. One of the pages with the amended text refers to a disposal rate of \$48.00 per ton. So not to cause any confusion with the pricing, it is suggested page II-11 be modified to refer to the current tipping fee.

Enclosed is a letter from County Board Chairman Mary Ann Harrington requesting the MDEQ to approve the Plan Amendments with the modifications noted.

Should you have any questions, feel free to contact me.

Sincerely,

Peter Van Steen
Transportation Planner

Enclosure

cc: Delta County Solid Waste Planning Committee
Gary Daniels, Golder Associates
Ken Diehn, Escanaba Paper Company
Todd Schmidt, Escanaba Paper Company

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MAY 13 2015

DEPARTMENT OF ENVIRONMENTAL QUALITY

DELTA COUNTY BOARD OF COMMISSIONERS

ADMINISTRATION OFFICE
310 LUDINGTON STREET
ESCANABA, MICHIGAN 49829
PHONE: 906-789-5100
FAX: 906-789-5197



May 5, 2015

Ms. Christina Miller
Sustainable Materials Management Unit
Solid Waste Section
Office of Waste Management and Radiological Protection
Department of Environmental Quality
PO Box 30241
Lansing, MI 48909-7741

Dear Ms. Miller:

As a follow-up to your letter dated April 14, 2015 clarifying some approval issues and the intent of the Delta County Solid Waste Management Plan Amendment submitted November 19, 2014 to your office, the Delta County Board of Commissioners met in regular session on May 5, 2015 to review your comments. The Board of Commissioners concurred with your recommendations as follows, with some minor editorial changes as indicated:

- On page II-8, Facility Description, Escanaba Paper Company, the acreage for "Total area of facility property" should be changed from 2,060 acres to 1,960. The acreage for "Total area sited for use" should be changed from 132.4 acres to 1,960 acres.
- On page III-10, Facility Description, Escanaba Paper Company, the acreage for "Total area of facility property" should be changed from 2,060 acres to 1,960. The acreage for "Total area sited for use" should be changed from 132.4 acres to 1,960 acres.
- The County Board recognizes that while the facility is designed to accept any non-hazardous industrial waste generated at the industrial facility, the acceptance of asbestos waste for disposal requires the landfill operator to comply with the requirements of the federal asbestos regulations, found in 40 C.F.R. parts 61 to 62, July 1, 1997 edition. The County Board recognizes the facility will remain permitted as a "Type III- Industrial ~~Waste-Facility~~ Landfill" as Type III- Low Hazard Industrial Waste or Construction & Demolition (C&D) Waste landfills cannot accept asbestos-containing waste material. The County Board recognizes that a C&D permit is not needed to accept C&D materials so long as it is generated at the facility.
- Page III-34, Siting Review Procedures, Siting and Process, first bulleted item will be revised to identify the change to the Plan as part of the Plan Amendment that was approved by the MDEQ

on January 16, 2007 to allow expansion of the Delta Landfill in Section 21 and the South half of Section 15. The revised bullet item will read as follows:

- "Expansion of the Delta Landfill facility located in Section 22, Section 21 and the South half of Section 15, Township 39 North, Range 23 West, Delta County, is permitted."
- Page III-34 Siting Review Procedures, Siting Criteria and Process, second bulleted item will be revised to clarify the term "non-Type II wastes", clarify the County intends to allow the Escanaba Paper Company to obtain a permit for a change or an additional waste disposal area type only for waste types that are generated on the Escanaba Paper Company facility property, including waste generated from any business that is located on the Escanaba Paper Company facility property, and to clarify that the total area sited for use is 1,960 acres as identified on the facility description page. The revised bulleted sentence will read as follows:
 - "Expansions of and/or changes in disposal area types shall only include other industrial waste types and/or construction and demolition waste generated at within the 1,960 acre facility property, up to 1,960 acres identified on the facility description page under the "Total area sited for use", at the Escanaba Paper Company landfill facility located in Sections 25 and 36, Township 40 North, Range 23 West are permitted."

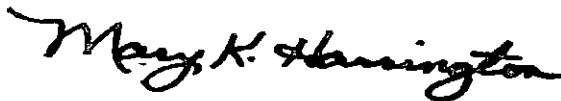
The Delta County Board of Commissioners requests the MDEQ to approve the Plan Amendment with these modifications.

In addition, it is noted the current disposal rate at the Delta Landfill is up to \$57.00 per ton. We request the last sentence on page II-11 be modified to reflect the current tipping fee. The revised sentence should read:

- "The Delta County Landfill allows individuals to haul and dispose of waste at the current rate of \$57.00 per ton. The minimum disposal fee is \$10.00 for up to 350 pounds of waste."

Should you require additional information, please do not hesitate to contact Peter Van Steen at the CUPPAD Regional Commission, 906.786.9234.

Sincerely,



Mary Ann Harrington, Chairperson
Delta County Board of Commissioners

cc: Delta County Solid Waste Planning Committee
Gary Daniels, Golder Associates
Ken Diehn, Escanaba Paper Company
Todd Schmidt, Escanaba Paper Company



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

April 14, 2015

Mr. Peter VanSteen
Central Upper Peninsula Planning and Development
2950 College Avenue
Escanaba, Michigan 49829

Dear Mr. VanSteen:

SUBJECT: 2013 Delta County Solid Waste Management Plan Amendment

This letter is a follow-up to our conversation on March 13, 2015, regarding clarifying some approval issues and the intent of the Delta County Solid Waste Management Plan Amendment (Amendment). In order for the Department of Environmental Quality (DEQ) to recommend approval and to acknowledge the intent of Delta County (County), the following modifications to the Amendment need to be made:

Page II-8, Facility Description, Escanaba Paper Company, the "Total area of facility property" identifies 2060 acres; however, based upon a review of the facility's restrictive covenant and confirmation from Mr. Todd Schmidt, Escanaba Paper Company, this amount should be 1960 acres. Therefore, the "Total area of facility property" should be changed to 1960 acres. Additionally, the County intended to allow Escanaba Paper Company to expand throughout its entire property; however, the Amendment only identified 132.4 acres, under the "Total area sited for use." Therefore, the "Total area sited for use" acres should be changed from 132.4 acres to 1960 acres. This change also applies to Page III-10 as well.

Please note that while the facility is designed to accept any non-hazardous industrial waste generated at the industrial facility, the acceptance of asbestos waste for disposal requires that the landfill operator comply with the requirements of the federal asbestos regulations, found in 40 C.F.R. parts 61 to 62, July 1, 1997 edition. Also, the facility must remain permitted as a "Type III - Industrial Waste facility" as Type III- Low-Hazard Industrial Waste or Construction & Demolition (C & D) Waste Landfills cannot accept asbestos-containing waste material. Further, it should be noted that a C&D permit is not needed to accept C&D materials so long as it is generated at the facility.

Page III-34, Siting Review Procedures, Siting Criteria and Process, first bulleted item does not identify the changes that were made in the Plan Amendment that was approved on; January 16, 2007. To alleviate any confusion, this item should be changed to reflect those updates as follows:

Expansions of the Delta Landfill facility located in Section 22, **Section 21, and the South half of Section 15**, Township 39 North, Range 23 West, Delta County, is permitted.

Page III-34, Siting Review Procedures, Siting Criteria and Process, second bulleted item states the following, "Expansions of and/or changes in disposal area types to include other non-Type II wastes at the Escanaba Paper Company landfill facility located...are permitted." The term "non-Type II wastes" is not defined and does not clearly identify the County's intent for this facility and should be changed to a definable waste type.

Also, based upon our conversation, the County intended to allow the Escanaba Paper Company landfill to get a permit for a change or an additional waste disposal area type only for waste types that were generated on the facility property, including waste generated from any business that is located on their facility property. The language identified above does not limit the facility as the County intended.

Further, the County intended to allow Escanaba Paper Company to expand throughout its entire property, which as noted in the second paragraph of this letter is 1,960 acres.

Based upon the above areas of concern and to clearly identify the County's intent this sentence should be changed to the following:

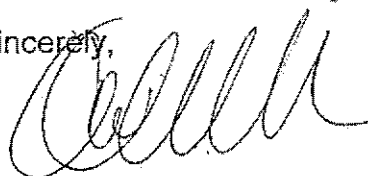
"Expansions of and/or changes in disposal area types shall only include other industrial waste types and/or construction and demolition waste generated at the facility property, up to the 1960 acres identified on the facility description page under the "Total area sited for use", at the Escanaba Paper Company landfill facility located in Sections 25 and 36, Township 40 North, Range 23 West are permitted."

If the County agrees with the DEQ administratively making these modifications to the Amendment as part of the DEQ's approval of the Amendment, please have a party who is authorized to act on behalf of the County provide a letter to the DEQ indicating the County's agreement with these changes and requesting that the DEQ issue its approval with these modifications. Examples of such a letter are enclosed.

The DEQ believes that the Amendment is not approvable without the modifications outlined above. If the County decides not to agree to have the DEQ make the changes as part of the approval process, the Office of Waste Management and Radiological Protection will recommend that the DEQ not approve the Amendment as written

If you have any questions or comments, please contact me at the telephone number below; via e-mail at millerc1@michigan.gov; or DEQ, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,

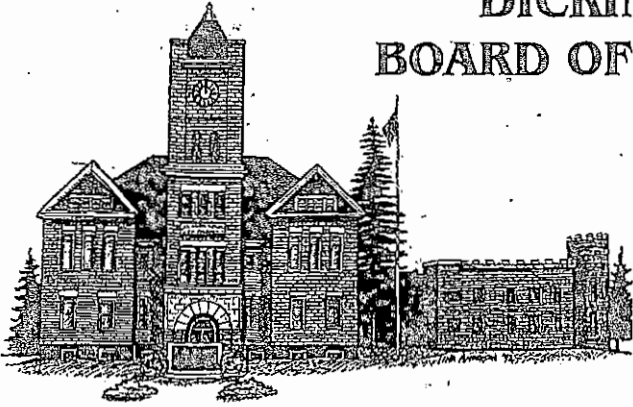
A handwritten signature in black ink, appearing to read 'Christina Miller', written in a cursive style.

Christina Miller
Sustainable Materials Management Unit
Solid Waste Section
Office of Waste Management and
Radiological Protection
517-614-7426

Enclosures

cc: Ms. Rhonda S. Oyer, DEQ
Delta County File

DICKINSON COUNTY
BOARD OF COMMISSIONERS



Board Chairman: Henry Wender
Vice Chairman: John P. Degenac, Jr.
Commissioners: Barbara J. Kramer
Ann Martin
Joe Stevens

Controller/Administrator: Nicole F. Frost
Assistant Controller: Sonya Pugh

ENCLOSURE EXAMPLE LETTER

July 3, 2014

Ms. Christina Miller
Sustainable Materials Management Unit
Solid Waste Section
Office of Waste Management and Radiological Protection
MDEQ
P.O. Box 30241
Lansing, MI 48909-7741

Dear Ms. Miller:

SUBJECT: Dickinson County Solid Waste Management Plan Amendment
Modification

As a follow up to your letter dated June 23, 2014, the Dickinson County Board of Commissioners respectfully requests the DEQ to issue its approval of the Dickinson County Solid Waste Management Plan (Plan) Amendment, and agrees with the DEQ administratively making the modification as discussed below.

The modification recommended by the DEQ involves the facility description for the Niagara Development, LLC Type III Landfill (Niagara) found on pages II-4 and III-9 of the Plan. Specifically, the stated "Total area sited for use: 29 Acres" in the amendment is in need of modification as it is contrary to the intent of the County.

The intent of the County was to allow for Niagara landfill to expand 68 acres, the total area of property at the facility. The "total area sited for use" acres identified in the Niagara facility descriptions on pages II-4 and III-9 should be changed to 68 acres

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JUL 09 2014

DEQ/AMD

AIR QUALITY DIVISION
See Map - ⑥

PROFESSIONAL ABATEMENT SERVICES, INC., MELVINDALE, WAYNE COUNTY. Written comments are being accepted on a proposed consent order to administratively resolve alleged air pollution violations. You may obtain electronic copies of the proposed consent order and Staff Activity Report at www.deq.state.mi.us/aps/downloads/Enforcement/AQD-Consent-Orders.shtml. Submit written comments to Jason Wolf, Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909. Written comments will be accepted by email and all statements must be received by February 11, 2015 to be considered by the decision-maker prior to final action. If a request is received in writing by February 11, 2015, a public-hearing may be scheduled. Information Contact: **Jason Wolf**, Air Quality Division, wolfj2@michigan.gov or 517-284-6772. Decision-maker: **Lynn Fiedler**, Air Quality Division Acting Chief.

OFFICE OF WASTE MANAGEMENT AND RADIOLOGICAL PROTECTION
See Map - ⑥

DELTA COUNTY SOLID WASTE MANAGEMENT PLAN AMENDMENT. Consideration of Department of Environmental Quality approval of the locally-approved amendment to the Delta County Solid Waste Management Plan (Plan Amendment). Delta County submitted this locally-approved Plan Amendment on November 21, 2014. Information Contact: **Ms. Christina Miller**, 517-614-7426, millerc1@michigan.gov. Decision-maker: **Mr. Bryce Feighner, P.E.**, Chief, Office of Waste Management and Radiological Protection.

WATER RESOURCES DIVISION
See Map - ⑦

PROPOSED PRIVATE USE AGREEMENT, MACKINAC COUNTY. Proposed private use agreement for 3.18 acres of Lake Michigan public trust bottomlands for a commercial fishing harbor, Hendricks Township, Mackinac County. File LM 287 Sault Ste. Marie Tribe of Chippewa Indians. Contact: **Tom Graf**, Water Resources Division, 517 284-5561; graft@michigan.gov. Decision-maker: **Water Resources Division Chief**.

WATER RESOURCES DIVISION
See Map - ⑦

PROPOSED PRIVATE USE AGREEMENT RENEWAL, LEELANAU COUNTY. Proposed renewal for a second term of 25 years for a 0.11-acre parcel of Lake Michigan public trust bottomlands for boat club, Leelanau Township, Leelanau County. File AS-087 Omena Traverse Yacht Club. Contact: **Tom Graf**, Water Resources Division, 517 284-5561; graft@michigan.gov. Decision-maker: **Water Resources Division Chief**.

Proposed Settlements of Contested Cases

NONE

Administrative Rules Promulgation

AIR QUALITY DIVISION

PART 55, AIR POLLUTION CONTROL, NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT, 1994 PA 451, AS AMENDED. The Air Quality Division will be holding a comment period and public hearing on January 26, 2015, at 1:30 p.m. on proposed revisions to administrative rules promulgated pursuant to Part 55, of the Natural Resources and Environmental Protection Act, 1994 PA 451 (NREPA). The rules are identified as Part 9, Emission Limitations and Prohibitions – Miscellaneous. The comment period and hearing will address requirements relative to the state administrative rules and revisions to Michigan's State Implementation Plan under the federal Clean Air Act. The purpose of these rules revisions is to adopt by reference specific federal regulations and industry testing methods, update some adoption by reference language, and move all adoptions by reference in the AQD rules to R 336.1902 to make the rules easier to use. The revisions will also remove obsolete compliance dates. The public hearing will be held on Monday, January 26, 2015, at 1:30 p.m., in the William Ford Conference Room, Constitution Hall, 2nd Floor South Tower, 525 West Allegan Street, Lansing, Michigan 48933. If there are no participants or if all those present have been offered the opportunity to speak, the hearing will close at 2:30 p.m. Copies of the proposed rules (ORR 2013-109 EQ) can be downloaded from the Internet through the Office of Regulatory Reinvention at www.michigan.gov/orr. Click on "Pending Rule Changes" in the left column. Under "Rules by Department," click on "Environmental Quality." Scroll to 2013-109 EQ and click on "Revision Text." Copies of the rules may also be obtained by contacting Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760. Phone: 517-284-6740, Fax: 517-241-7499, or debrulerc@michigan.gov. Written comments will be accepted until 5:00 p.m. on January 26, 2015, and should be mailed to the address listed above. Information Contact: **Cari DeBruler**, Air Quality Division, debrulerc@michigan.gov or 517-284-6740. Decision-maker: **DEQ Director**.

EXECUTIVE SUMMARY

CONCLUSIONS

The Solid Waste Planning Committee reviewed and discussed various scenarios and options of waste disposal. Alternatives ranged from ceasing operations of the present county landfill and exporting wastes, to continuing with the landfilling of wastes locally.

The alternatives were assessed as to their consistency with solid waste management goals and objectives, their economic feasibility and the likelihood of receiving public approval.

The Delta Solid Waste Management Authority (Landfill Authority) recently, as a result of negotiations with the Department of Environmental Quality, reconstructed its landfill facility and has an expected 28 years of capacity. The Landfill Authority has financial commitments for bonds for the reconstruction activities.

The preferred alternative is continue with landfilling of waste at the Delta Landfill, with efforts directed at resource recovery of recycling and composting to prolong the life of the landfill. Diverting hazardous materials from the waste stream would prevent possible contamination while preserving the landfill liner integrity by lessening the potential of its failure.

SELECTED ALTERNATIVES

Disposal of residential household and industrial waste is provided at the Delta Landfill. The Delta Solid Waste management Authority has recently reconstructed its Type II landfill facility and has an expected life of 28 years.

Escanaba Paper Company provides for the disposal of generated industrial and construction & demolition waste at all integrated facilities located within the facility boundary of the Escanaba Paper Company at its company-owned and maintained landfill.

Collection of solid waste is hauled by both private haulers and the municipalities of the Cities of Escanaba and Gladstone, and the Village of Garden. A transfer station owned and operated by Garden Township, hauls wastes collected at that site to the Delta Landfill. Individuals can direct haul wastes to the Delta Landfill.

Solid waste is authorized to be imported from Alger, Baraga, Chippewa, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon and Schoolcraft Counties for primary disposal. Acceptance of waste at the Delta Landfill is contingent upon acceptance of the waste for disposal by the Delta Solid Waste Management Authority, with a maximum of 24,000 tons a year from other counties.

Solid waste is authorized to be exported to Alger, Baraga, Chippewa, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, and Schoolcraft Counties. Exportation of solid wastes, other than waste generated by Escanaba Paper Company is permitted when there is a discontinuance of Delta Landfill operations. Waste that cannot be accepted at the Delta Landfill or the waste is processed through a transfer station owned or operated by the Landfill Authority may be exported.

DATA BASE

Essentially all the waste generated within Delta County is disposed of at the Delta Landfill, in accordance with the Delta County flow control ordinance. Type III waste (inclusive of industrial waste, sludge, ash and construction & demolition waste) generated by operations of Escanaba Paper Company and integrated facilities located within the facility boundary of Escanaba Paper Company is disposed at its landfill. Municipal sludge is generated from both the water and wastewater treatment operations of the cities of Escanaba and Gladstone. The following chart details the amount of waste generation by source.

Waste Generation in Delta County (as reported from various sources)			
	Current Annual	Five Year	Ten Year
Delta Landfill			
Residential	13,899.01 tons	14,176.99 tons	14,460.53 tons
Commercial	9,342.92 tons	9,511.42 tons	9,701.65 tons
Construction/Demolition	4,414.76 tons	4,503.06 tons	4,593.12 tons
Industrial (ash & petroleum soil)	11,685.08 tons	11,918.78 tons	12,157.16 tons
City of Escanaba			
Municipal Sludge	319 tons	325.385 tons	331.89 tons
City of Gladstone			
Municipal Sludge	75 tons	76.5 tons	78.03 tons
Escanaba Paper Landfill (Escanaba Paper Company)			
Industrial Sludge	56,000 cubic yards	58,800 cubic yards	61,700 cubic yards
Industrial Waste (ash)	58,000 cubic yards	60,900 cubic yards	64,000 cubic yards
Industrial Waste	TBD		
C & D Debris	TBD		

The Delta Solid Waste Management Authority has recently completed reconstruction of two cells (3A and 3B) at the Type II landfill with a double composite liner. The Landfill Authority has closed Cell 2 with final cover, as well as the Type III landfill. Effective January 31, 1998, the Landfill Authority stopped accepting waste for disposal in Cell 1 and the Type III landfill. The closures and reconstruction activities were required as part of a consent agreement between the Michigan Department of Environmental Quality and Delta Solid Waste Management Authority. In 1996, the DEQ discovered abnormally high levels of iron and manganese in test wells at the landfill. In addition the landfill was having problems with its leachate collection system. Based on current waste volumes, the reconstructed landfill is expected to have a 28 year capacity.

DATA BASE

Solid Waste Disposal Areas for Delta County

Delta County Solid Waste Landfill is located in the North $\frac{1}{2}$ of Section 22, Township 39 North, and Range 23 West in the City of Escanaba. The land is leased by Delta County from the City of Escanaba. Delta County subleases the land to the Delta Solid Waste Management Authority (Landfill Authority). The landfill serves as the disposal site for Type II and Type III wastes generated within Delta County. The facility is located on a 63.2 acre parcel, of which 8.70 acres are permitted as a landfill. With an estimated yearly disposal volume of 25,000 tons, the landfill has an estimated lifetime of 28 years.

Garden Township Transfer Station is located in the Southeast $\frac{1}{4}$ of the Northeast $\frac{1}{4}$ of Section 16, Township 40 North, Range 18 West, and Garden Township. Garden Township constructed the transfer station using funding through the Clean Michigan Fund. The transfer station accepts Type II wastes from the surrounding area. The size of the structure is 65 feet by 17 feet and contains a roll-off container, compactor pit, hopper and attendant's office and rest room. An adjacent garage houses the facility's roll-off truck. The wastes are hauled to the Delta Landfill.

Escanaba Paper Company operates a landfill in Sections 25 & 36, Township 40 North, and Range 23 West for disposal of wastes generated by integrated facilities located within the facility property. There are 2,060 acres of facility property with 132.4 acres permitted as a landfill with an estimated life of 37 years.

FACILITY DESCRIPTIONS

Facility Type: Type III Landfill (Industrial and C&D Landfill)

Facility Name: Escanaba Paper Company

County: Delta Location: Town: 40N Range: 23W Section(s): 25, 36

Map identifying location included in Attachment Section: Yes No

If facility is an Incinerator or a Transfer Station, list the final disposal site and location for Incinerator ash or Transfer Station wastes

Public Private Owner: Escanaba Paper Company

Operating Status (check)

- open
- closed
- licensed
- unlicensed
- construction permit
- open, but closure pending

Waste Types Received (check all that apply)

- residential
- commercial
- industrial
- construction & demolition*
- contaminated soils*
- special wastes **
- other: asbestos waste

(New facility)

* Authorized to be accepted upon issuance of a construction permit or other necessary approvals from the MDEQ

** Explanation of special wastes, including a specific list and/or conditions:

Site Size:



RETURN TO
APPROVAL
LETTER

Total area of facility property: 2060 acres

Total area site for use: 132.4 acres 

Total area permitted: 132.4 acres

Operating: 42 acres

Not excavated: 90.4 acres

Current capacity: 4,200,000 tons or yds³

Estimated lifetime: 37 years

Estimated days open per year: 365 days

Estimated yearly disposal volume: 114,000 tons or yds³

(if applicable)

Annual energy production:

Landfill gas recovery projects: N/A megawatts

Waste-to-energy incinerators: N/A megawatts

DATA BASE

SOLID WASTE COLLECTION SERVICES AND TRANSPORTATION INFRASTRUCTURE

The following describes the solid waste collection services and transportation infrastructure that will be utilized within the County to collect and transport solid waste.

Service Provider	Public/Private	Service Area	Payment	Disposal Facility
Garden Township Transfer Station	Public	Village of Garden, Garden Township, Fairbanks Twp.	Two mills on Garden Township property and per bag charge for non-township residents	Delta County Landfill
City of Escanaba	Public	City of Escanaba	City property tax Added fee	Delta County Landfill
City of Gladstone	Public	City of Gladstone	City General Fund Added fee	Delta County Landfill
Delta Disposal	Private	Delta County	Customer	Delta County Landfill
Great American Disposal	Private	Walmart and Bark River	Customer	Delta County Landfill
Nichols Disposal	Private	Delta County	Customer	Delta County Landfill
Escanaba Paper Company	Private	Escanaba Paper Company	Escanaba Paper Company	Escanaba Paper Company Landfill

Municipal Collection Services:

The City of Escanaba provides residential and commercial collection services within the City. This service is supported financially through the general property tax and a separate utility fee. A special utility fee of \$3.00 to \$12.00 per month is charged to each single family home, apartment or commercial business in the city. This fee was established to help offset collection and disposal costs.

The City of Gladstone provides residential and commercial collection services within the City. A utility fee of \$4.00 monthly, in combination with general property tax revenues, supports this service. The additional utility fee has been levied since August 1, 1997, to help offset increased landfill tipping fees.

The Garden Township Transfer Station located in Garden Township accepts general household (Type II) solid wastes. The transfer station is owned and operated by Garden Township. Operational costs of the transfer station are provided through a 2 mill property tax levy. Persons living outside of Garden Township may use the transfer station on a pay-per-bag basis. Solid waste collected at the facility is hauled to the Delta County Landfill for disposal.

Village of Garden provides residential and commercial collection service within its boundaries. The waste is hauled to the Garden Township Transfer Station. Operational and maintenance costs are provided through the Village property tax.

Private Collection Services:

The private collection services of Escanaba pick-up Service and Delta Sanitation merged in August of 1997 to form Delta Disposal. Delta Disposal provides residential and commercial collection services throughout Delta County. The waste is transported to the Delta County Landfill. The service charge is based on the frequency of collection and type of container and service provided.

Great American Disposal provides collection services for commercial sites in the City of Escanaba (such as WalMart) and residential collection in the western section of Delta County. The service charge is based on the frequency of collection and type of container and service provided.

Nichols Disposal provides residential and commercial collection services. This service charge is based on frequency of collection and type of container and service provided.

Escanaba Paper Company provides for waste hauling and disposal for all solid waste generated within the facility property. The costs are the responsibility of Escanaba Paper Company.



The Delta County Landfill allows individuals to haul and dispose of waste at the current rate of \$48.00 per ton. The minimum disposal fee is \$5.00 for up to 230 pounds of waste.

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EVALUATION OF DEFICIENCIES AND PROBLEMS

The following is a description of problems or deficiencies in the existing solid waste system.

- Increased Recycling vs. Waste to sustain operations: Based on the current tipping fee of \$48.00 a ton, the Delta Landfill needs more than 2,000 tons per month to cover operations and repayment of the landfill bonds. A dramatic increase in recycling rate for the county could adversely impact the landfill finances, but at the same time recycling could prolong the air space available at the landfill. The landfill authority could experience a short term cash flow problem, but in the future would not have to construct new cells as planned. An increase in recycling efforts may result in an increase in tipping fees in the short-term, but will have long-term environmental and financial benefits.
- Flow Control: There is the concern that there is waste leaving the county in violation of the county flow control ordinance. There have been several instances of building demolition's where the waste was brought to a landfill in another county or governmental agencies allowing waste to be disposed of out of county. Delta County needs to continue to monitor and actively enforce the flow control ordinance. The County has increased the fine to \$500 a day for violation but the ordinance should be reexamined to assure that there is no financial gain to utilize an out-of county landfill. Violators of the ordinance should compensate the Landfill Authority for the difference in the out of county tipping fee and the tipping fee charged at the Delta Landfill, in addition to the \$500 per day fine. And/or jail time.

Demolition permits issued by the respective jurisdictions should indicate that all demolition waste must be delivered to the Delta Landfill in conformance with the Delta County Flow Control Ordinance. As more buildings are torn down in the county, there is the chance that more waste will be transported out of county.

- Escanaba Paper Company: Escanaba Paper Company has operations as well as land holdings in other counties in the Upper Peninsula. A possible scenario is the Company may have oil or barrels illegally dumped on its property which the Company needs to dispose of. For liability reasons, the Company would like to have the option of transporting wastes generated at its operations or wastes found on its own property disposed of at its own landfill located in Delta County. Flow control in Marquette County prohibits the company from bringing these wastes into Delta County for disposal at its landfill. The present Delta County Solid Waste Plan also prohibits such waste to be brought into Delta County. The new updated county plan should recognize that this waste should be considered as industrial and be allowed to come into the county for disposal at the Escanaba Paper Company Landfill.
- Waste Generation to Increase: An increase in waste generation amount is likely as the county population grows, which will tend to improve the landfill's revenue situation. With an expected increase in tonnage disposed at the Delta Landfill, an increase in recycling participation may not have a negative impact on the landfill's cash flow.

Pays a reduced fee for the amount of ash that is used as daily cover; at present, the Landfill Authority receives money for its daily cover. If and when the power plant closes, the Landfill Authority will have to pay for its daily cover.

Due to better utilization and more efficient management of operations, there is less ash being generated than in previous years; The Landfill Authority will need to purchase sand for daily cover.

- Contingency Disposal Agreements: Now that the Delta Landfill has secured its operating permit from the DEQ, the Landfill Authority should proceed with negotiations with landfills in surrounding counties, especially Marquette, Alger and Menominee Counties, for a contingency /reciprocal use agreements in case a problem develops with the landfill in the future.

The Landfill Authority should have discussions with Escanaba Paper Company on the use of its landfill for a short-term basis in the case of an immediate emergency. The agreement may be reciprocal to provide Escanaba Paper Company a disposal facility they could utilize on a short term basis for an immediate emergency. Since the Escanaba Paper landfill is a Type III landfill, it would be restricted to the Type III waste being disposed at the Delta County Landfill, and not the Type II waste being disposed at the Delta County Landfill. The Escanaba Paper Landfill's operating license may further restrict the kind of Type III waste that can be accepted at this landfill. The language of a reciprocal agreement would specify what type of waste can be disposed at the respective landfills.

- Leachate Line at the landfill: The leachate line from the landfill to the Escanaba city sewer system needs to be upgraded from a two inch line to a four inch line to clean and maintain. The City of Escanaba realizes that an eight inch sewer line would be beneficial in order to provide sewer services to any business or industry that may want to locate along 19th Avenue North. Cost for the increase in the size of the line could be proportionally shared between the Landfill Authority and the City.

- Illegal Dumping: As the rates for waste disposal increase, there is the problem of people disposing waste illegally in the woods on public and private lands.

- Ongoing Recycling Education: For the voluntary recycling program to be effective, an ongoing public education program is needed. Brochures could be distributed to the public at the landfills and regular advertising of the program.

DATA BASE

SOLID WASTE MANAGEMENT ALTERNATIVES The following briefly describes all solid waste management systems considered by the County and how each alternative will meet the needs of the County. The manner of evaluation and ranking of each alternative is also described. Details regarding the Selected Alternatives are located in the following section. Details regarding each non-selected alternative are located in Appendix B.

There are a number of alternatives which have been considered regarding management of solid wastes in Delta County:

Alternative #1:

- Cease county landfill operations: The Delta Landfill would cease operations and existing landfill cells would be closed. All waste would be shipped to a landfill out of county. The waste could be processed and hauled by either the Landfill Authority by its own employees or under contract with a private firm to an out-of county landfill for disposal. The cost for such an arrangement is estimated to be \$58.50 per ton. Closure and past-closure costs would exceed \$20 million.

All waste generated within the Escanaba Paper Company property would continue to be disposed of at its site. The shipment of the industrial and/or construction & demolition waste from the property to an out- of-county site would have a dramatic negative impact on its operations.

Alternative #2:

- Waste Incineration: All wastes collected in the county would be incinerated for generating electricity. Waste materials that cannot be reduced, reused, or recycled would be separated into combustible and non-combustible materials. The only materials requiring landfilling would be incinerator ash and non-combustibles such as concrete rubble.

Nationally, about 14 percent of municipal solid waste is incinerated which indicates it is still a viable option in some areas. In Michigan, however, due largely to increased regulation of air emissions, the popularity of incineration has declined and the cost of operation risen.

Challenges facing an incineration alternative include locating a market for the energy produced, complying with air emission standards, and existing financial commitments to the landfill.

Based on previous plans and studies, it was determined there was not enough waste generated in Delta County to consider it feasible.

The primary benefit is the preservation of landfill space through a significant reduction in the amount of material being disposed. Secondary benefits are: availability of an alternate fuel for energy production and greater attention to recycling.

Alternative #3:

- Organic waste conversion: Waste would be converted to a pellet that would be burned as

SELECTED SYSTEM

There are some outlying areas in the county which do not receive curbside recycling service. Efforts need to be explored to expand the service, through encouraging private haulers to provide the service or the Landfill Authority providing the service.

The manned recycling center has expanded hours.

- **Hazardous Waste Collection Program:** As a result of the Consent Agreement with the DEQ, the Landfill Authority will have instituted a Household Hazardous Waste Collection program, in addition to being a depository for pesticides collected from throughout the UP. Through a State grant from the Michigan Department of Agriculture, the Delta Solid Waste Management Authority has become the central deposit point for unneeded pesticides from throughout the Upper Peninsula. Program collection and disposal costs are reimbursable; administrative costs are the responsibility of the Authority.
- **Escanaba Paper Company:** All waste generated as a result of operations within Escanaba Paper Company's facility property in Delta county would be landfilled at its own landfill facility, including industrial waste and construction & demolition debris. All costs would be the company's responsibility.
- **Enforcement and Local Ordinance/Resolutions:** The county solid waste flow control ordinance will remain in effect to assure that residential and commercial waste generated in the county (with the exception of waste generated within Escanaba Paper Company's facility boundary) is disposed of at the Delta Landfill. Local units will be allowed the opportunity to implement rules and regulations regarding the collection and funding of programs within their respective jurisdiction.

FACILITY DESCRIPTIONS

Facility Type: Type III Landfill (Industrial and C&D Landfill)

Facility Name: Escanaba Paper Company

County: Delta Location: Town: 40N Range: 23W Section(s): 25, 36

Map identifying location included in Attachment Section: Yes No

If facility is an Incinerator or a Transfer Station, list the final disposal site and location for Incinerator ash or Transfer Station wastes

Public Private Owner: Escanaba Paper Company

Operating Status (check)

- open
- closed
- licensed
- unlicensed
- construction permit
- open, but closure pending

(New facility)

Waste Types Received (check all that apply)

- residential
- commercial
- industrial
- construction & demolition*
- contaminated soils*
- special wastes **
- other: asbestos waste

* Authorized to be accepted upon issuance of a construction permit or other necessary approvals from the MDEQ

** Explanation of special wastes, including a specific list and/or conditions:

Site Size:

Total area of facility property: 2060 acres

Total area site for use: 132.4 acres

Total area permitted: 132.4 acres

Operating: 42 acres

Not excavated: 90.4 acres

Current capacity: 4,200,000 tons or yds³

Estimated lifetime: 37 years

Estimated days open per year: 365 days

Estimated yearly disposal volume: 114,000 tons or yds³

(if applicable)

Annual energy production:

Landfill gas recovery projects: N/A megawatts

Waste-to-energy incinerators: N/A megawatts

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SITING REVIEW PROCEDURES

AUTHORIZED DISPOSAL AREA TYPES

The following solid waste disposal area types may not be sited by this Plan. Any proposal to construct a facility listed herein shall be deemed inconsistent with this Plan.

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SITING CRITERIA AND PROCESS

Expansion or constructions of the following solid waste facilities are considered to be consistent with the Delta Solid Waste Management Plan Update:



- Expansions of the Delta Landfill facility located in Section 22, Township 39 North, Range 23 West, Delta County is permitted.
- Expansions of and/or changes in disposal area types to include other non-Type II wastes at the Escanaba Paper Company landfill facility located in Sections 25 and 36, Township 40 North, Range 23 West are permitted.
- Construction of a solid waste transfer station in Section 22, Township 39 North, Range 23 West, and Delta County is permitted.



Facilities other than those identified above require a formal amendment to the Plan Update in order to be considered consistent with the County Solid Waste Management Plan. Ten years of landfill capacity has been provided to Delta County and therefore Delta County chooses not to have a siting process in its Plan.

Volume Reduction Techniques:

- The Delta Landfill Authority will continue to monitor the use of the compactor at the landfill to save valuable airspace at the facility.

Collection Process:

- Local units of governments will retain the right to collect solid waste within their jurisdiction, contract with private haulers or allow the private sector to assume the service. Private haulers will continue to provide waste collection services to residences and businesses within the county. The cities of the Escanaba and Gladstone and the village of Garden (and other municipal waste haulers) will be responsible for funding their respective programs in accordance with state statutes.
- Garden Township will continue with operation of the Garden Township Solid Waste Transfer Station transporting the wastes to the Delta Landfill. The Township could contract with a private firm for operation and management of the facility.

Operational costs of the facility will be the responsibility of Garden Township. Funds could come from the township's general fund, extra voted millage, special assessment and/or per bag fee charged to non-residents. Through agreements, the Townships of Nahma and Fairbanks could contribute toward the operational costs.

Landfilling:

- The landfilling of wastes will remain the primary waste disposal option.
- The Delta Solid Waste Management Authority will continue with its role of providing for the disposal of waste in Delta County. Construction of new cells and/or expansions of the existing site will occur as needed.

Expansion costs should be funded through the tipping fee; sufficient funds should be set aside for construction costs, as well as reserve fund to pay for the eventual closure of the facility. The Authority should periodically evaluate the user fee to make certain the tonnage fee collected adequately provides sufficient revenue for operations, future expansion and closure activities.

- Escanaba Paper Company will continue to manage all non-hazardous solid wastes generated within the facility property by disposal at its landfill. Construction of new cells and expansions at the existing facility will occur as needed. Operating costs are the responsibility of Escanaba Paper Company.

ADVANTAGES AND DISADVANTAGES OF THE SELECTED SYSTEM:

Each solid waste management system has pros and cons relating to its implementation within the County. Following is an outline of the major advantages and disadvantages for this Selected System.

ADVANTAGES:

1. There are 28 years of capacity for waste disposal at the Delta Landfill.
2. Cost savings will continue as a result of compacting waste at the Delta Landfill.
3. The Landfill Authority structure provides for representation of cities and townships to discuss solid waste issues and concerns.
4. Public ownership of the landfill will assure the tipping fee is kept to a minimum with environmentally sound management.
5. The county-wide recycling and composting program will continue to divert materials away from the waste stream, thus extending the life of the landfill.
6. All waste generated through Escanaba Paper Company facility property operations will be economically disposed of at its own disposal site.
7. Hazardous and pesticide collection program will assure that the integrity of the landfill is maintained.

DISADVANTAGES:

1. There is a lack of final disposal options available to the consumer.
2. After the landfill is closed, on-going closure activities will be the responsibility of the Landfill Authority and the City of Escanaba.
3. The present voluntary recycling program does not result in 100% participation of the public.