N2689 V.J. Manila Monroe

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

N268935771

FACILITY: VIENNA JUNCTION LANDFILL		**SRN / ID:** N2689
LOCATION: 6505 HAGMAN RD, ERIE		**DISTRICT:** Jackson
CITY: ERIE		**COUNTY:** MONROE
CONTACT: John Stark , Manager		**ACTIVITY DATE:** 07/26/2016
STAFF: Diane Kavanaugh-Vetort	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Additional Contact: Jim Adams, Republic Services. Conducted complete scheduled compliance inspection. FCE Title V Major Source. NSPS Subpart WWW, MSW landfill.		
RESOLVED COMPLAINTS:		

VIENNA JUNCTION CONTACTS:

JIM ADAMS, PE, ENVIRONMENTAL MANAGER, 734-848-5223, jadams2@republicservices.com (JA)

JOHN STARK, OPERATIONS MANAGER, 419-726-9465 ext. 15, jstark@republicservices.com (JS)

DEQ PRESENT:

DIANE KAVANAUGH VETORT, AQD (DKV)

ALEX WHITLOW, OFFICE OF WASTE MGMT AND RADIOLOGICAL PROTECTION (AW)

MONROE COUNTY PRESENT

DAN ROCK, Monroe County Solid Waste (DR)

COMPLIANCE INSPECTION

On July 26, 2016 I conducted a scheduled inspection of Vienna Junction Landfill (VJ) with Jim Adams, Republic Environmental Manager, and John Stark, General Manager, Vienna Junction Landfill. The purpose of the inspection was to determine VJ's compliance with the applicable federal and state requirements, specifically Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules and the conditions of their Renewable Operating Permit (ROP) MI-ROP-N2689-2014. VJ is subject to the New Source Performance Standard (NSPS) for Municipal Solid Waste Landfills (MSW), 40 CFR Part 60, Subpart WWW.

This was a joint inspection with Alex Whitlow, OWMRP and he invited Dan Rock, Monroe County. AW was conducting a required quarterly inspection of the general landfill operation. He informed me following the site visit that he did not identify any compliance issues.

There is an odor complaint history however complainants are a relatively few nearby neighbors, and they have a working relationship with John Stark. Complainants normally call John, and at times DEQ-AQD. The most recent complaint received dates were: 5/12/16, 2/23/16 and 9/10/10. Most of VJ's residential neighbors are to the NE, some are NW, West, and SW. Area to the South is more Commercial /Industrial and to the east is also the major highway. It has been AQD's experience that VJ has been very responsive and cooperative with complaints.

Upon my arrival I conducted an odor observation by driving around the perimeter of the VJ landfill - as much as that is possible due to the north and northeast roads are quite a distance away in those directions and this requires crossing the I-75 highway in two different places. I did not observe any odors around landfill until I reached the Dixie Hwy overpass when I was stopped at the traffic light. I detected a faint, distinct garbage odor. Wind was generally coming from the northwest.

Upon arrival to the main office at VJ, I met with AW and DR in the parking lot. Together we entered the office, provided identification and met with JS and JA.

During the inspection JA informed me that beginning in March 2016 the primary landfill gas (LFG) control, the Landfill Gas Treatment System owned/operated by Fortistar, was not operational. It is his understanding that Fortistar's off-site customer for the treated LFG (GM-Powertrain, Boilers in Toledo, Ohio) currently has no demand for the treated LFG. This means that all of the LFG is untreated and is now going to the Republic owned / operated Enclosed Flare. Per JA the estimated LFG production at this time is approximately 1500 standard cubic feet per minute.

VJ is required to report Control Equipment downtime on their Semi-annual and Annual NSPS reports. There must be LFG control at all times. The reporting must include all time periods of greater than 1 hour in which no control is operational and all valves are required to be shut. GM boilers normally combust the treated landfill gas, which represents an acceptable means of landfill gas control in Subpart WWW along with the Enclosed Flare running concurrently.

JS, JA, AW , DR and I all rode together onto the Landfill and around the outer perimeter road to conduct the physical inspection. VJ is currently building a new area referred to as Area 6. Cell 4, which is the 3rd separate area constructed below grade along the east side of landfill adjacent to the railroad tracks. VJ refers to the landfill by "Areas" and Cells are within the area. Area 6, Cells 1-4 are currently being filled, there is approximately 15 years total with expansion.

At the top near the active filling area I observed an odor control mist sprayer device. One of two mist sprayers were operational. JS acknowledged that usually two should be operating. I did observe typical landfill odor while we were in the active area.

Three solidification pits are still located on the topmost portion of the landfill. I observed they were not actively operating at this time. Currently they are using a mixture of wetted fly ash from a coal-fired power plant in Detroit, River Rouge at 75%, with auto fluff at 25%. Per the prior inspection report, the ash is described as "wetted ash" designated as conditioned fly ash, and is brought on-site in this state, as opposed to the super-dusty dry fly ash directly from the power plant.

From the top of the hill we observed the Construction and Demolition (C&D) site, a landfill located nearby in Ohio. VJ uses this for the majority of its C&D wastes and it has a few years left before it reaches capacity. Also I observed VJ's small composting area, everything is in one pile.

We drove the entire perimeter of the landfill near the base. The previous compliance inspection report (Glen Erickson) noted at the road VJ systematically installed condensate clean-out risers every 100 ft. or so to assist in providing consistent, maximum vacuum to the wellfield.

On the southwest side of the landfill is the location of the Treatment System and the Enclosed Flare. I observed the following readings from the Flare: Temperature at 1450 deg. F; consuming 1430 scfm of untreated landfill gas; with no VEs; 58 inches of vacuum being recorded at the flare data recorder.

Briefly, we also met with Chris Moyer, Fortistar Wellfield Technician with CB&I Environmental & Infrastructure, consultant for VJ. He was near the Landfill Gas treatment system area and was preparing to go out on the wellfield. I observed the TS was not operational.

Other Miscellaneous information:

VJ has three ponds on the north side that gravity feed to Lake Erie. They have NPDES Permit and they are checked semi-annually. On the south side the discharge is to Toledo, Ohio. They have a different permit requirement and are checked monthly.

Leachate is sent to the City of Toledo Sanitary Sewer., approximately 800,000 gallons.

VJ accepts various liquid wastes and per JA many of their Wells have pumps in them. They accept some

sludges and some off-specification liquids. "Cousins" was mentioned, as sends them clean-out wastes.

I observed a truck filling up with water from a hydrant, per JA this is Toledo water used for dust control. Overall dust control seemed to be adequate as there were no excessive dust emissions observed.

During our inspection we then drove completely outside the landfill property boundary and around the nearby area bordering the facility. JS pointed out nearby industry that is located in Toledo, Ohio upwind of them (with predominant winds out of the SW). He said these are also a source of odors. One in particular is noted here: Ardin (spelling), is an adhesive manufacturer and has an adhesive type odor. During the drive JS also pointed out the regular complainant's homes and some homes that VJ has purchased in the past, or still owns or has now sold. No odors were observed during the drive outside the facility boundary.

RECORDKEEPING

During the inspection I reviewed the most current "as-built" of the site. I also reviewed the VJ Operations & Maintenance Monthly Reports prepared by CB&I and kept on-site in binders. I request that JA send to me electronic copies for January 2016 and June 2016. I also requested the NSPS required, Surface Emission Monitoring Report for the 1st and 2nd quarters of 2016. I received all requested records later this same day. Recordkeeping copies are attached to this report to file.

VJ's reports indicated there were no surface monitoring exceedances identified during the 1st and 2nd quarters. A Photo Vac Micro flame ionization detector (FID) was used to perform the emissions monitoring. According to VJ's Operations & Maintenance Monthly Reports, the gas extraction Well operation and measurements are taken using a LandTec GEM 2000 gas analyzer and extraction monitor. The NSPS requires that each well head within a landfill gas collection system must maintain an Oxygen level below 5 percent., negative pressure, and temperature below 131 degrees Fahrenheit. It is not unusual to have one or more wells with a parameter outside of the requirement at most landfills. Corrections are required to be made timely usually within 15 days of identification. Alternative remedy and timelines requests can be submitted to AQD for approval. VJ has some Wells with approved alternative Oxygen, and higher operating value temperatures (HOV). These are indicated in the Well logs as part of these reports.

VJ January 2016 monthly report indicates there were very few Well issues and all were corrected timely. The January monthly report also indicates the Flare operated 78.08% of the time. There were numerous short duration shutdown/restart events. The average methane percentage at the Flare was 41.2%.

VJ June 2016 monthly report indicates there were very few Well issues and all were corrected timely. The June monthly report also indicates the Flare operated 100% of the time. The average methane percentage at the Flare was 41.5%.

In 2015 I received an updated Gas System As-Built as a full sized plan. This has been placed in AQD files.

COMPLIANCE SUMMARY

Overall, Vienna Junction Landfill, including the landfill active gas collection system, the flare, and treatment system (not operational) appeared to be in full compliance with all their ROP conditions and applicable requirements at this time. I did not observe any fugitive dust or odor issues during the inspection.

NAME Diane Kahl Vetort DATE 9/1/16 SUPERVISOR