

N2689  
Monroe

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

N268945120

FACILITY: VIENNA JUNCTION LANDFILL		SRN / ID: N2689
LOCATION: 6505 HAGMAN RD, ERIE		DISTRICT: Jackson
CITY: ERIE		COUNTY: MONROE
CONTACT: John Bolyard , Operations Manager		ACTIVITY DATE: 07/11/2018
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Title V Major Source. Complete scheduled compliance inspection PCE/FCE.		
RESOLVED COMPLAINTS:		

**VIENNA JUNCTION INDUSTRIAL PARK SANITARY LANDFILL CONTACTS:**

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(Currently on leave)

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**DEQ PRESENT:**

**DIANE KAVANAUGH VETORT, AQD JACKSON DISTRICT (DKV)**

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**CONSULTANTS:**

**ANDY SECORD, AIR QUALITY SPECIALIST, INC., [andys@airqualityspecialist.com](mailto:andys@airqualityspecialist.com) (248) 420-4233**

**SCS FIELD SERVICES (SCS) Environmental Consultants and Contractors, 2950 Westway Dr. Suite 111 Brunswick, OH 44212, (330) 659-0827. SCS conducts Well field Monitoring.**

**COMPLIANCE INSPECTION**

On July 11, 2018 I conducted a scheduled inspection of Vienna Junction Landfill (LF) and Vienna Junction Energy, LLC (hereinafter VJ), unannounced, with John Bolyard, Operations Manager, Republic Services. AQD environmental contact is Dawn Wright, Republic Services, Environmental Manager, who was not available today. The purpose of the inspection was to determine VJ's compliance with the applicable federal and state regulations, 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. The ROP contains two Sections, S1 -Republic Services, and S2- Fortistar Methane Group (Landfill Gas to Energy).

VJ is currently subject to the New Source Performance Standard (NSPS) for Municipal Solid Waste Landfills (MSW), 40 CFR Part 60, Subpart XXX. This is due to the site having obtained an expansion permit and commenced construction, reconstruction, or modification after July 17, 2014. VJ was previously subject to Subpart WWW, and these applicable requirements are contained in their ROP. VJ also has applicability of the National Emission Standards for Hazardous Air Pollutants (NEHSHAP) for MSW Landfills, 40 CFR 63, Subpart AAAA which references Subpart WWW therefore VJ still has these applicable requirements. The Subpart XXX compliance schedule indicates VJ must fully comply with Gas Collection & Control System (GCCS) under Subpart XXX within 30 months of their Design Capacity & NMOC Report (submitted 11/28/16). An updated GCCS Plan dated November 28, 2017 has been submitted to DEQ AQD and was shared with Waste Management & Radiological Protection Division. It is pending joint review by both Divisions.

Today's inspection was a joint inspection with Tammy Bell, Technical Programs Unit (TPU) Asbestos Inspector. MSW landfills like VJ commonly accept friable & non friable Asbestos from Demolition & Construction/Renovation. AQD TPU conducts periodic inspections of the general landfill operation related to Asbestos. AQD Districts have also reviewed this information and conduct inspections through the LF's ROPs, specifically it contains a Table EUASBESTOS-S1 with these applicable requirements.

There is an odor complaint history at VJ LF however the complainants are a relatively few nearby neighbors, and AQD has not received a complaint since 2016. Most of VJ's residential neighbors are to the NE, some are NW, West, and SW. The area to the South is more Commercial /Industrial and to the east is also a major highway I-75. 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 and this requires crossing the I-75 highway in two different places. I did not observe any odors. Wind was generally coming from the northwest. Weather during the inspection ranged from 75 to 81 degrees F, ENE Wind @3- 5 mph.

Upon arrival to the main office at VJ, I met with Tammy in the parking lot. Together we entered the office, provided identification and stated purpose of inspection to two female employees in the office. We were informed that John was off site at a meeting. They set us up in the Conference room to review some Asbestos related records and they contacted him. John Bolyard arrived a short time later and he accompanied us on the physical inspection of the site. The former Operations Manager John Stark retired since the prior compliance inspection and AQD learned that long time prior contact Jim Adams, Republic, Environmental Mgr. has left the company.

During the inspection I observed that the primary landfill gas (LFG) control system, the Vienna Junction Energy, LLC, EUTREATMENTSYS-S2, Landfill Gas Treatment System owned/operated by Fortistar, was not operational. It has not been in operation for well over 1 year. Fortistar's former customer for the treated LFG (GM-Powertrain, Boilers in Toledo, Ohio) no longer has demand for the treated LFG. AQD's understanding is Fortistar is looking at other options for the LFG usage.

In 2017 Fortistar VJ submitted a ROP Modification application for the addition of a Rule 201 permit exempt, small LFG Open Flare. During today's inspection I inquired about this with John, and Andy Secord and determined no Flare has been installed and no new customer has been found to Republic's knowledge. This means that all of the LFG is untreated and is ducted to the Republic owned and operated Enclosed Flare. During the inspection the Enclosed Flare was observed to be in good condition and operational. Additional details are recorded below.

VJ is required to report Control Equipment downtime on their ROP Semi-annual and Annual, NSPS, and LF MACT SSM reports. There must be LFG control at all times except as specified in the standard. 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. The LFG controls cannot be shutdown for longer than 5 days or this is a deviation/ potential violation. At this time VJ does not have a back-up control system.

### SITE INSPECTION

Section 1 of the ROP contains the LF (Republic) Tables: EULANDFILL-S1, EUACTIVECOLL-S1, EUENCLOSEDFLARE-S1, EUASBESTOS-S1 and FGCOLDCLEANERS-S1.

Section 2 of the ROP contains the LFG to Energy (Fortistar) Table: EUTREATMENTSYS-S2

John, Tammy and I rode together onto the Landfill and around the outer perimeter road to conduct the physical inspection. VJ is currently filling the area referred to as Area 6. We drove up to the active area and observed this activity. 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 2.5 years capacity remaining in this Area per John. The new vertical expansion will be constructed over the closed area (on Site Map Area 1-2) and will allow additional capacity / years @ 10 or more.

During the prior inspection in 2016 I observed an operating portable odor control mist sprayer device. I did not see it operating today and asked John about this and he was not aware of it. We discussed that in both AQD and LF's experience "odor misters" have very limited control or benefit. I did observe a typical garbage/fresh trash landfill odor while we were above the active area and when we drove up to the active face. I also detected the same garbage odor, less strong, down wind of the active face on the perimeter road. At this time due to the absence of complaints odor control may not be necessary. This should be revisited as needed in the future.

Three solidification pits are still located on the topmost portion of the landfill Area 5, Cell 1 & 2. I observed they were not actively operating at this time. Currently they are using a mixture of Lime mixed with auto fluff at 25%. Both materials were piled up next to the pits. Per my prior inspection report, the DTE flyash described as "wetted ash" is no longer used in solidification per John. He said they solidify approximately 15,000 gallons per day.

From the top of the hill we observed the Construction and Demolition (C&D) site, a landfill located just across the border in Ohio. VJ uses this for the majority of its C&D wastes but it has now just about reached capacity per John. VJ will then likely receive more C&D.

The entire partially closed Area is where the new expansion permit is to be constructed. VJ is currently housing it's various materials and a small composting operation here which will all need to be moved. I did not observe any new cell or pre-cell construction has taken place yet.

We drove the entire perimeter of the landfill near the base. It has been previously noted that VJ systematically installed condensate clean-out risers every 100 ft. or so to assist in providing consistent, maximum vacuum to the wellfield. The overall cover conditions appeared to be good with no observed large areas of erosion or seepage.

On the southwest corner of the landfill is the location of the EUTREATMENTSYS-S2 (inspected/observed not operating) and the John Zink EUENCLOSEDFLARE-S1, blowers and associated ductwork. The entire area is secured by fencing. I observed the following readings from the Flare control panel: Temperature at 1500 deg. F; consuming 1200 SCFM of untreated landfill gas; with no VEs. I did not see the reading for the vacuum or methane content and John was not able to bring it up on control panel. Both are parameters on the monthly Flare reports and I received a copy of the most recent June 2018. In this report the vacuum on 6/15 read: 50.8 inches of vacuum being recorded at the flare data recorder. On that date Temperature was 1490 deg. F; CH<sub>4</sub> (methane) 44%; and SCFM was 1346.

#### 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 Ohio permit requirement and are checked monthly. Leachate is sent to the City of Toledo Sanitary Sewer.

I inquired about VJ acceptance of Sewage Sludge (SS), a highly odorous material. John is newer to this facility and he had the current employees check on this for us. They stated that VJ accepts SS from the City of Monroe primarily.

Fugitive Dust: It was a dry day and has been a very dry month so far. Overall landfill dust control seemed to be adequate as there were no excessive dust emissions observed. I observed the Water truck operating on the hill. John said that he has calcium chloride treated the haul & perimeter roads already this season.

#### RECORDKEEPING

During the inspection I requested and received an electronic copy of the 2017 most current "as-built" of the site. (Map placed in file) In addition I was informed that CB&I is no longer the Well Technician/ Consultant and the new Consultant is SCS. I requested John send me electronic or hard copies of several Monthly Well monitoring reports for 2018, and the 2018 1st and 2nd Quarter Surface

## Emission Monitoring (SEM) Reports.

### SEM Reports:

John gave me one SEM report on site and their consultant Andy Secord met with us at the closing conference and sent me electronic copies of the other quarterly SEM and VJ's Jan, Feb, March and June, 2018 Monthly Reports. AQD is referring to the monthly reports as "VJ Operations & Maintenance Monthly Reports". I received all requested records later the same day. Recordkeeping copies are attached to this report to file.

VJ's 1st Quarter SEM report indicates there were two surface monitoring exceedances identified during the initial and 10-day remonitoring. The exceedances cleared at the second 10-day event. The initial exceedance locations: EW-109 802 ppm >500 ppm and EW89R 635 ppm >500 ppm.

VJ's 2nd Quarter SEM report indicates there were no surface monitoring exceedances identified.

According to the SEM Reports measurements are taken using a Trimble Photo Vac Micro flame ionization detector (FID).

### VJ Operations & Maintenance Monthly Reports:

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.

The current list of Wells with approved alternative operating scenarios (AOS), and higher operating value temperatures (HOV): EW98 (140F HOV), EW54R (150F HOV), EW77R (AOS if O<sub>2</sub> >5%), EW81R (150F HOV), EW82R (150F HOV), EW101R (140F HOV), EW30R2 (AOS if O<sub>2</sub> >5%), EW59R3 (AOS if O<sub>2</sub> >5%), and EW63R2 (150F HOV). Andy explained "the AOS allows these wells to serve as "intermittent" collectors - when there is no gas, they're closed, and if there is a hiccup of methane, VJ can collect it."

The O&M Reports also include monitoring data for Well CH<sub>4</sub> %, pump conditions, and liquid levels. They include a Site Inspection Report (cover, etc..), and Flare overall status check and Start-up, Shut-down, Malfunction (SSM). Overall Reports appear to be very thorough and are acceptable to AQD as Compliance monitoring at this time.

VJ January 2018 monthly report indicates there were 10 Well issues and 6 were corrected timely. There were four open Well exceedances at the end of the month EW077R, EW0049, EW105R, EW30R2. Andy provided the following update EW77R and EW30R2 have approved AOS, EW49 cleared 2/6/18 (14 days), EW105R cleared 2/5/18 (13 days). The January report indicates monitored 100 Wells for CH<sub>4</sub> (methane threshold > 58%) and 24 were above the threshold = 24%. Report includes review/check of in-Well Pumps and liquid levels. The Flare operated 97.13% of the time. On 1/8 the CH<sub>4</sub> reading at the Flare was 44%. The Vacuum (wc) at the blower inlet was -48.7.

VJ June 2018 monthly report indicates there were 23 Well issues and 21 were corrected timely. There were two open Well exceedances at the end of the month EW-77R and 30R2. These both have AOS. The June report indicates monitored 100 Wells for CH<sub>4</sub> and 20 were above the threshold = 20%. Report includes review/check of in-Well Pumps and liquid levels. The Flare operated 98.67% of the time. On 6/15 the CH<sub>4</sub> reading at the Flare was 44% and a repair was noted and resulted in % increase to 48. The Vacuum (wc) at the blower inlet was -50.8.

### ASBESTOS

Federal regulation is 40 CFR Part 61, Subpart M. The most recent 2018 notice was submitted online per Tammy. AQD's Asbestos notification system is online and is designed primarily for Demolition /

Construction contracting activities. It doesn't fit the MSW LFs very well. LF are required to keep manifests and to notify before disturbing asbestos disposal areas. The disposal areas are marked on a site map. Most LFs typically submit a notice annually for the construction season. VJ in the past submitted hard copy letters, now AQD wants everyone to use the database. VJ takes both friable and non-friable materials and all are handled the same way per John. The primary Companies they receive material from are based in Ohio. Total Environmental and MEI were mentioned. Tammy went through a checklist with John and obtained various hard copy records for follow up.

During the physical site inspection we observed that the entire LF property is fenced and there is Asbestos signage posted near the active area. There was an Asbestos submittal earlier today that had already been buried.

It appeared VJ was in compliance with the requirements however Tammy will review materials she obtained and check into generators if possible (Ohio) and will let me know if any issues are found.

#### COMPLIANCE SUMMARY

Overall, Vienna Junction Landfill (LF) and Vienna Junction Energy, LLC, including the landfill active gas collection system, the Enclosed flare, and Treatment System (idled) appeared to be in full compliance with their ROP conditions and applicable state and federal requirements at this time. I did not observe any fugitive dust or odor issues during the inspection. All documents received have been placed in the plant files.

NAME



DATE

7/19/18

SUPERVISOR

