

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

N598824219

FACILITY: CITY ENVIRONMENTAL SERVICES INC OF WATERS		SRN / ID: N5988
LOCATION: 11375 SHERMAN RD, FREDERIC		DISTRICT: Cadillac
CITY: FREDERIC		COUNTY: CRAWFORD
CONTACT: James Palmer , District Manager		ACTIVITY DATE: 01/21/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Field Inspection & Records Review		
RESOLVED COMPLAINTS:		

On January 21, 2014, Ms. Caryn Owens of the DEQ-AQD inspected the City Environmental Waters Landfill, located at 11395 Sherman Road in Frederic, Crawford County, Michigan. More specifically the site is located on the west side of Sherman Road approximately 1.5 miles south of the Marlette and Sherman Roads intersection. The site is a major source for volatile organic compounds (VOCs) and the DEQ was inspecting this source per ROP Number MI-ROP-N5988-2010. This site is subject to 40 CFR 60 Subpart WWW. An inspection brochure was not given to anyone at the facility. This site considered to be a minor source of hazardous air pollutant (HAP) emissions because the source doesn't emit 50 megagrams (Mg) or more of non-methane organic compounds (NMOCs). The source will become subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste (MSW) Landfills in 40 CFR Part 63 Subpart AAAA when calculated uncontrolled NMOC emissions are equal to or greater than 50 Mg per year.

On-site Inspection:

DEQ was escorted by Ms. Deb Johnston and Mr. James Palmer of Waste Management during the inspection. The weather was partly cloudy and approximately -10°F, with calm winds. The site consists of 270 acres with approximately 100 acres permitted for landfill use. The permitted area contains a main building containing offices and a vehicle maintenance area, an approximately 14,000-gallon above ground storage tank for leachate, a leachate evaporator building, a flare for landfill gas, and an active landfill area for waste. The landfill accepts approximately 45 percent MSW, and about 55 percent of special waste which 2 percent is demo waste. Landfill gas is collected at the site via an active gas collection system through 31 onsite gas wells. The collected landfill gas is routed to an onsite flare where it is destructed. The flare is constantly lit, and a heat shimmer was observed during the field inspection. A portion of the landfill gas powers the leachate evaporators. The leachate collected at the site is routed to the leachate evaporators and overflow goes to the leachate above ground storage tank. The leachate evaporator building contains 6 separate evaporator vessels with burners to evaporate the liquid. During the field inspection the leachate flow rate was 25.8 gallons per minute. The burner temperatures ranged between 1060-1500°F. Additionally, the leachate evaporator building contains a storage tank and a clarifier tank for the leachate. The clarifier tank allows heavy material to settle, and lighter material recirculates to the evaporators. The heavier material is disposed of at the landfill.

Records Review:

EULANDFILL<50

The applicable condition in this section is the emission unit associated with the Tier 2 testing. The most recent Tier 2 testing was completed October 2011. Based on the test results, NMOC levels were 29.55 Mg per year which is below the 50 Mg per year limit. The site reported the annual emissions through MEARS, and all other conditions are not applicable until the 50 Mg per year threshold has been exceeded. The Tier 2 report is attached.

EUASBESTOS: This site actively collects asbestos waste.

I. and II. Emission Limits and Material Limits are not applicable for EUASBESTOS.

III. Process/Operational Restrictions:

III.1: No visible emissions were observed during the field inspection in the area where asbestos containing waste material was deposited. The area the asbestos containing material is deposited in is surveyed and

mapped with GPS coordinates and depth. The waste material is immediately buried, so opacity and human exposure is not a concern.

IV. Design/Equipment Parameters

IV.1: All asbestos containing material cells buried in the landfill are mapped and have been/will be excluded from placement of gas collection systems. Currently the gas collection system at the facility is active with some of the gas being flared and the rest being used as fuel in leachate evaporators.

V. Testing/Sampling requirements are not applicable for EUASBESTOS.

VI. Monitoring/Recordkeeping

VI.1.a-c: Shipment records with names, address, and telephone numbers of the waste generators and transporters were reviewed. Each shipment record had the associated GPS location and depth buried, which corresponded with a map of the facility and the buried asbestos locations identified.

VI.2 & 3: DEQ reviewed the records indicating the locations, depth of area, and quantity of asbestos material received by the landfill from December 2012 – December 2013. The landfill received 16 loads of asbestos containing materials within that time frame.

VII. Reporting

VII.1-3: All semi-annual and annual reporting for EUASBESTOS has been performed in a timely manner.

VII.4: The facility is still in operation, therefore this is not applicable for EUASBESTOS.

VIII.5: DEQ was able to review all records associated with EUASBESTOS.

VIII.6: There were no records of asbestos materials being disturbed or relocated at the site.

VIII. & IX. Stack/Vent Restrictions and Other Requirements are not applicable for EUASBESTOS.

FGCOLDCLEANERS: There was one small, cold cleaner (approximately 1.5 feet x 2 feet) onsite in the maintenance area of the main building. The cold cleaner was not in use during the inspection, and appeared to be in good condition. The lid to the cold cleaner was down, and the instructions to properly use it were next to it.

Summary:

The activities covered during the field inspection and records review for the facility indicate the facility was in compliance with the permitted limits in accordance with ROP number MI-ROP-N5988-2010.

NAME Carlyn Owens

DATE 2/3/14

SUPERVISOR [Signature]