

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

N598835269

FACILITY: CITY ENVIRONMENTAL SERVICES INC OF WATERS		SRN / ID: N5988
LOCATION: 11375 SHERMAN RD, FREDERIC		DISTRICT: Cadillac
CITY: FREDERIC		COUNTY: CRAWFORD
CONTACT: Deb Johnston , Environmental Manager		ACTIVITY DATE: 06/28/2016
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: 2016 FCE.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation 2016

I inspected the City Environmental Waters Landfill to determine compliance with ROP number MI-ROP-N5988-2015 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: clear, temp. 65, N wind 10 mph.

Prior to entering the facility, I observed that there were no odors outside of the facility. No odors were detected inside the facility during the inspection except for immediately downwind of the active area. Gas collection wells collect landfill gas for use in the leachate evaporators. Excess gas is directed to a flare. The evaporators were operating at the time of the inspection but there were no visible emissions. The flare was also operating with no visible emissions. The plant roads, yard, and the active parts of the landfill had no noticeable visible emissions during the inspection and appeared to be in good repair. Most of the roadways are paved. Leachate concentrate is recycled into the landfill and serves a dust control function in the active part of the landfill.

The ROP for this facility was renewed on 10/20/2015. The majority of ROP permit conditions associated with this facility only apply once the facility has reached a non-methane organic carbon (NMOC) emissions threshold of 50 Megagrams per year based on testing. The facility has not exceeded that threshold. Therefore, only applicable permit conditions are addressed in this report.

FACILITY DESCRIPTION – The Waters Landfill is a municipal solid waste landfill whose design capacity is greater than 2.5 million megagrams or 2.5 million cubic meters. The facility is subject to 40 CFR 60 Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills). Subpart WWW requires a facility whose design capacity is greater than 2.5 million megagrams or 2.5 million cubic meters to obtain a Renewable Operating Permit. The facility is also subject to the Asbestos NESHAP since it accepts asbestos containing materials.

Following are the results of this inspection by applicable ROP condition:

SOURCE-WIDE CONDITIONS

IX. OTHER – A fugitive dust plan is maintained and appears to be followed based on observations during the inspection.

EULANDFILL<50

V. TESTING/SAMPLING – As a requirement of the ROP and 40 CFR 60 Subpart WWW, the facility is required to perform Tier 2 testing every five years. The last Tier 2 test was completed in December 2011. The next Tier 2 test is scheduled for September 27, 2016.

VI. MONITORING AND RECORDKEEPING - The facility is required to calculate, record, and submit the yearly NMOC emission rate to the AQD. The facility calculates and submits the yearly NMOC emissions through the Michigan Air Emission Reporting System (MAERS). The 2015 MAERS submittal was reviewed and determined to be adequate. The NMOC emission calculations are attached.

VII. REPORTING - Semi-annual deviation reports, annual certifications of compliance, and MAERS were previously reviewed and were submitted timely with proper certification. No deviations have been reported.

EUASBESTOS

III. PROCESS/OPERATIONAL RESTRICTIONS – The facility is required to ensure that there are no fugitive asbestos emissions. The facility has opted to cover any asbestos-containing waste with at least six inches of compacted non-asbestos containing material once every 24 hours as allowed by the Asbestos NESHAP. Fencing is installed around the perimeter of the landfill as required by the Asbestos NESHAP. Asbestos warning sign installation on the fences is not required due to the implementation of the daily cover requirement of 40 CFR 61.154(c)(1).

IV. DESIGN/EQUIPMENT PARAMETERS – Gas collection devices are not installed in areas of the landfill where asbestos has been deposited in accordance with 40 CFR 60.759(a)(3)(l).

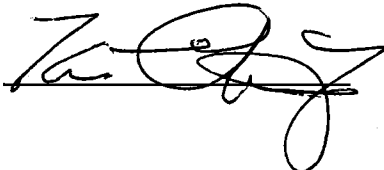
VI. MONITORING AND RECORDKEEPING – The facility is required to maintain waste shipment records consisting of the waste generator, the transporter, the quantity of asbestos containing material and the date of receipt. The facility is adequately documenting the information by maintaining a binder with a record of each waste shipment received. The facility is also required to maintain records of the location, depth, area, and quantity of asbestos containing material with the disposal site on a map or diagram. The facility has set up a grid within the landfill and the location of where the asbestos containing material is placed is recorded. The coordinates of the material location are determined using a GPS and that information is recorded as well. There have been 6 shipments so far in 2016.

FGRULE290 – This flexible group is for emission units that are exempt from the requirements of Rule 201 pursuant to Rule 290. The Leachate system is exempt under Rule 285(aa). At the time of the inspection there was not any R 290 exempt equipment.

FGCOLDCLEANERS

There is one cold cleaner on site that is a small parts cleaners serviced by Safety Kleen. It appeared in good repair and the cover on it was closed. No odors were noted around the unit and housekeeping around it was good.

EVALUATION SUMMARY – Based upon the on-site inspection and records review, the AQD believes the facility is in compliance with ROP MI-ROP-N5988-2015, the Asbestos NESHAP, and 40 CFR 60 Subpart WWW.

NAME  DATE 6-30-16 SUPERVISOR 