

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N598863107

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|-----------------------------------------------------|-------------------------------|---------------------------|
| 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: 06/02/2022 |
| STAFF: Kurt Childs | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: 2022 FCE. | | |
| RESOLVED COMPLAINTS: | | |

Full Compliance Evaluation 2022

I Inspected the City Environmental Waters Landfill to determine compliance with ROP number MI-ROP-N5988-2021 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: clear skies, temp. 60, WNW wind 5 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. Gas collection wells collect landfill gas for use in the leachate evaporators. Excess gas is directed to a flare. 2 of the 4 evaporators were operating at the time of the inspection, there was a steam plume but no visible emissions. The other two evaporators were being cleaned. The flare was also operating with a visible flare but no visible emissions. The plant roads and yard active parts of the landfill had no noticeable visible emissions during the inspection and appeared to be in good repair. Some visible emissions from the daily cover on the active area of the landfill were being raised by bulldozer activity but the dust was confined to the active area of the landfill. Most of the roadways are paved with the exception of access roads on the south side of the landfill and the box drop and storage area. Remaining areas were vegetated or covered. Leachate concentrate is recycled into the landfill and serves a dust control function on the active part of the landfill. Excess leachate is stored in a tank and hauled to an injection well for disposal.

The ROP for this facility was renewed on 06/02/2021. This ROP was reopened on 01/14/2022 by the AQD to incorporate newly applicable requirements from 40 CFR 62, Subpart OOO which will replace the requirements of 40 CFR 60, Subpart WWW in the current ROP. The reopened ROP is expected to be issued later this year.

The majority of ROP permit conditions associated with Subparts WWW (and OOO) only apply to this facility once the It has reached a non-methane organic carbon (NMOC) emissions threshold of 50 Megagrams per year (Subpart WWW) or 34 Megagrams per year (Subpart OOO) based on testing. Based on the most recent Tier 2 testing from 2021 the facility has not exceeded either threshold, the NMOC emission rate reported from that test was 22.26 MG/yr and projected to be 24.74 MG/yr in 2022. Therefore, only currently 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:

COMPLIANCE EVALUATION

SOURCE-WIDE CONDITIONS

IX. OTHER – A fugitive dust plan is maintained by City Environmental and is on file with the AQD. It appears to be followed based on observations made during the inspection.

EULANDFILL<50

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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 to determine if it is subject to further requirements. The last Tier 2 test was completed on September 27, 2021. The next Tier 2 test is due by September 27, 2026.

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 2021 MAERS submittal was reviewed and determined to be adequate. As indicated above, the current NMOC emission rate is 24.74 MG/yr. Note that the emissions estimates provided in the annual MAERS report utilize LandGEM model calculations (which is allowed), not the Tier 2 test results, so the values are significantly different. The NMOC emission calculations, waste acceptance records, evaporator and flare emissions provided with the MAERS report 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

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

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)(I). Asbestos disposal locations are mixed in with general waste disposal but are identified by GPS coordinates and depth. This information is referenced when installing any future gas wells.

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 which includes a waste receipt ticket and shipping manifest. 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. The locations are also indicated on a map of the landfill. There have been 7 shipments of asbestos containing waste received so far in 2022

FGRULE290 – This flexible group is for emission units that are exempt from the requirements of Rule 201 pursuant to Rule 290. This includes HAP emissions from the evaporation of leachate (not from fuel combustion). The Leachate collection and handling system is exempt under Rule 285(aa).

I. EMISSION LIMITS – Evaporator HAP emissions are evaluated by required emissions calculations submitted in the annual MAERS report.

VI. MONITORING/RECORDKEEPING – Evaporator emissions are calculated by using airflow, operating hours, landfill gas lower heating value (LHV) and MAERS emission factors

Emissions calculations submitted with the 2021 MAERS report indicate NMOC emissions are less than the 1,000 lbs/month limit under Rule 290 (NMOC 26.78 lbs in 2021).

FGCOLDCLEANERS

There is one cold cleaner on site that is a small (<10 sq.ft.) parts cleaners serviced by Safety Kleen. The lid was open at the time of the inspection but in use. The unit is marked with the operating procedures. A 148 degree flash point solvent is used.

EVALUATION SUMMARY – Based upon the on-site inspection and records review, the AQD believes the facility is in compliance with ROP MI-ROP-N5988-2021, the Asbestos NESHAP, and the applicable requirements of 40 CFR 60 Subpart WWW at this time.

NAME 

DATE _____

SUPERVISOR _____