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

N600739332

FACILITY: Tri-City RDF		**SRN / ID:** N6007
LOCATION: 426 N. Ruth Rd., CARSONVILLE		**DISTRICT:** Saginaw Bay
CITY: CARSONVILLE		**COUNTY:** SANILAC
CONTACT: Steve Walters , Environmental Engineer		**ACTIVITY DATE:** 04/06/2017
STAFF: Gina McCann	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection of MI-ROP-N6007-2012.		
RESOLVED COMPLAINTS:		

I (glm) conducted an announced site inspection at the Tri City Recycling and Disposal facility (RDF). Tri City RDF is a Type II municipal solid waste landfill which is owned and operated by Waste Management of Michigan, Inc. The landfill accepts municipal and solid waste, construction debris, foundry sand, ash and contaminated soils. No odor was noticed as I drove toward the landfill. Waste Management representatives Steve Walters, Division Engineer and Responsible Official, John Gall accompanied me during the inspection. I toured the landfill including the flare. Tri City RDF was issued Renewable Operating Permit number MI-ROP-N6007-2012 effective on November 13, 2012. Tri City RDF is subject to NSPS Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills, and NESHAP Subpart AAAA - Municipal Solid Waste Landfills. An ROP renewal application was received March 13, 2017.

On-site records review included monitoring results for landfill gas collection and control system (GCCS) components, asbestos receiving and placement, and waste acceptance records. No violations of air regulations or permits were found during the inspection.

EULANDFILL: Compliant

The landfill began accepting waste in 1987. On May 25, 2012, MDEQ Resource Management Division approved a solid waste disposal area construction permit for a vertical expansion of 80.2 acres at the landfill. The expansion increases the design capacity by 7,871,600 cubic yards. The landfill is subject to NSPS WWW requirements applicable to a landfill with NMOC emission rate of greater than 50 megagrams per year and a maximum design capacity greater than 2.5 million megagrams. The last Tier II test for the landfill gas NMOC concentration occurred in 2010. The average of the NMOC sample results was 309.2 ppm, as hexane.

I reviewed the waste acceptance records. Each load is entered into a corporate maintained database. The person at the weigh station records load weight, category, generator, and transporter. The information in the database is used to generate yearly reports for the amount of waste received and number of trucks traveling on site. The facility uses the waste acceptance rates and truck numbers to calculate

emissions. The records appeared adequate to make required emission estimates. Annual waste acceptance rates from 1987 through 2016 are attached. The facility accepted 44,861 tons in 2016. The waste acceptance records are used to calculate the NMOC emission values calculated using LandGem and reported to MAERS. The MAERS 2015 NMOC reported emissions were 3.17 tons.

Methane surface scans are conducted quarterly. There were no instances of a methane surface scan over 500 ppm. I reviewed records for the first through fourth quarter 2016 and the first quarter for 2017. Surface scan monitoring is being conducted on the same days as the GCCS monitoring. The gas technician is notified if the surface scan has any high readings. Adjustments to the well field to balance gas collection rates at wells or surface repairs can be made as needed. Methane monitoring records include the required information/documentation according to 40 CFR 60.755(c).

The facility has a cover integrity program in place and implements cover repairs as necessary. The gas well technician inspects the cover while performing gas well tuning each month. The technician enters comments of "good" or "bad" in reference to the integrity and has expanded comments on a separate handwritten log. The facility is making adjustments to the "good/bad" comments being entered into the data logger to reflect corrective actions that are necessary instead.

MACT AAAA & SSM: I reviewed the sites Startup, Shutdown and Malfunction plan and annual reports for 2013 and 2014. The site had several flare malfunctions in 2015. The flare has historically had malfunctions mainly caused by power outages. A Malfunction Abatement Plan for the flare was requested and received in 2013 due to the repeated deviations for power outage. The site is located at the end of the electrical connection, where there are very brief interruptions. A "flicker" in the electricity being received by the flare causes it to shutdown, which then has to be manually restarted. The electricity that feeds the site is three-phase at M-46 then converts to single stage down Ruth road and subsequently has to be converted back to three-phase at the flare so it can accept it.

The facility installed a new single phase flare with a variable frequency drive (VFD) in 2015 and tested the control device in November 2015. The new flare also is able to automatically restart itself, which appeared to be the cause of historical malfunctions. All SSM events were responded to in manner consistent with the SSM.

The SSM plan had some revisions, an update version will be submitted to the Department.

EUACTICCOLL: Compliant

The gas well technician was not on site during the inspection, therefore well gas parameters were not viewed while on site. However, GCCS monitoring records from

June 2016 through March 2017 were reviewed. The GEM is calibrated sent to the manufacturer semi-annually for calibration. Gas well data was within the appropriate range.

EUOPENFLARE: Compliant

At the time of the inspection the flare was accepting gas at a flow rate of 360 scfm with a temperature of 955 F. The overall vacuum on the well field was -16.00 "W.C. 40 CFR Part 60 NSPS WWW requires reporting of all flare downtime greater than one hour and periods when the gas collection system was not in operation in excess of five days. The facility reported deviations in their Annual, Semi-annual, NSPS and SSM reports along with the corrective action taken.

The current flare has a design capacity of 2000 cfm. The flare operating information is monitored and recorded via a computer based tracking, record keeping, & alarm system. The system monitors flare temperatures and flows. An alarm is triggered for flame absence. The alarm will call an assigned employee. Flare flow and temperature records for June 2015, October 2016 and March 2017were reviewed. All required flow and temperature information was recorded.

FGCOLDCLEANERS: Compliant
Documentation of solvent usage is maintained by Safety Kleen.

EUASBESTOS: Compliant

I reviewed asbestos records and asbestos placement tracking. The facility maintains a map and database that include the asbestos generator, volume, and placement within the landfill. The site does not receive much regulated asbestos waste. All required information was recorded and available. There were 2 loads of asbestos containing material received in 2016. These waste manifest records are attached. The facility was reminded that if they disturb asbestos in the landfill proper notification is required per their ROP and 40 CFR Part 61 Subpart M - Asbestos NESHAP.

At the time of the inspection the facility was in compliance with its ROP and applicable air quality regulations.

NAME Steve L. Mc DATE 4/20/17 SUPERVISOR C. Hare