

N6009  
MAWRA

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

N600931380

FACILITY: SAUK TRAIL HILLS DEVELOPMENT		SRN / ID: N6009
LOCATION: 5011 S LILLEY RD, CANTON TWP		DISTRICT: Detroit
CITY: CANTON TWP		COUNTY: WAYNE
CONTACT: CHRISTINA PEARSE ,		ACTIVITY DATE: 08/27/2015
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : August 27, 2015  
 TIME OF INSPECTION : 9:45 am  
 LEVEL OF INSPECTION : II  
 NAICS CODE : 562212  
 EPA POLLUTANT CLASS : NMOC  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Christina Pearce, Environmental Manager  
 FACILITY PHONE NUMBER : 734-231-8217  
 EMAIL CONTACT : cpearse@republicservices.com

### FACILITY BACKGROUND

Sauk Trail Hills Development is a solid waste landfill facility. The facility collects solid waste five days per week, with additional collection times on Saturday if needed. The facility began accepting waste in 1975. The landfill plans to operate for about fifteen more years. Sauk Trail is located near the intersection of Haggerty Road and Michigan Avenue in Canton, Michigan. Currently, this facility is considered a major source, and is operating under Title V Renewable Operating Permit (ROP) MI-ROP-N6009-2012.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility since the last inspection. No Violation Notices (VN) have been issued regarding this facility since the last inspection.

### PROCESS EQUIPMENT AND CONTROLS

Sauk Trail Hills operates a municipal solid waste landfill, the active landfill gas collection system at the landfill that uses gas mover equipment to draw landfill gas from the wells and moves the gas to the control equipment and two open flares. A third flare was formerly at this site, but was removed in 2012. The facility has one cold cleaner in a maintenance area.

The landfill accepts waste, as well as building debris including nonfriable asbestos. The facility is allowed to accept friable asbestos, though it hasn't accepted this type of waste in the past few years.

### INSPECTION NARRATIVE

I arrived at the facility and met with Ms. Christina Pearce. Ms. Pearce and I discuss the landfill and any changes that had occurred since the last inspection. The landfill currently is accepting solid waste. The facility will also collect non friable asbestos waste, and maintains the proper documentation from the party bring that particular waste. When nonfriable asbestos waste is brought into the landfill, it is tucked into the bottom of the lift. The facility

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can also accept friable asbestos waste, though it has not collected this type of waste since September 2013.

Landfill gas is collected through a system of wells throughout the landfill. This gas is sent to Canton Renewables, where it is treated to be used by Detroit Edison. Excess gas, or gas collected when Canton Renewables is not operating is piped to one of two flares that are maintained by the landfill. At one time the facility also operated a third portable flare, though this flare is no longer located at this location. During the onsite inspection both flares were operating properly. The facility collects leachate in the leachate tank, where it is then sent into the city sewer system.

In the next few years, the facility plans to start placing waste into cell F, which has not collected waste. Although, dirt will need to be removed from this cell, so that waste can be collected.

After discussing the landfill operations, we took a site tour of the facility. We drove to the top of the active cell. During the onsite inspection, waste was being placed in cells C and G. I observed daily cover on the top of the landfill, which consists of crushed vehicle parts, excluding metals, fluids, glass, and any other parts that may have some standalone value.

#### **APPLICABLE RULES/PERMIT CONDITIONS**

Sauk Trails is currently operating under ROP MI-ROP-N6009-2012. This permit was issued on July 26, 2012 and will need to be renewed before it expires on July 26, 2017.

**EULANDFILL** – This emission unit represents the general municipal solid waste landfill. The collected landfill gas is sent primarily to one of the two open flares, or is purified by Canton Renewables.

- I. Emission Limits – Compliance The methane concentration is monitored on a quarterly basis. During 2014 there were zero locations at Sauk that exceeded 500 ppm of methane. The monitoring took place on March 21, 2014, June 20, 2014, September 23-24, 2014 and November 12, 2014.
- II. Material Limits – NA
- III. Process/Operational Restriction – Compliance. The facility is complying with the federal landfill requirements. The facility performs monthly monitoring of each well head for oxygen, pressure, and temperature. The facility also performs quarterly monitoring for surface methane.
- IV. Design/Equipment Parameters
  1. Compliance – The facility has installed and is maintaining a landfill gas collection system. Monthly and quarterly monitoring are performed.
  2. Compliance – The landfill gas is controlled by one of the two flares that are operating at the site. During the onsite inspection, the flares were operating properly.
- V. Testing/Sampling
  1. Compliance – The facility performs quarterly surface methane monitoring. There were zero locations that exceeded 500 ppm methane during 2014.
  2. Compliance – The facility completes quarterly methane monitoring. A record of all monitoring points is maintained.

3. Compliance – Written records are maintained on site. The facility has record of all sample dates and locations, including a map of the facility with the locations marked.
  4. Compliance. The facility uses the proper instrumentation when performing surface scans for methane at the facility.
  5. Compliance – The facility performs quarterly surface methane monitoring. Any exceedances are reported as part of the annual and semiannual ROP certification as a deviation. No exceedances have been reported within the last year.
- VI. Monitoring/Recordkeeping
1. Compliance – The facility monitors the landfill cover on a monthly basis.
  2. Compliance – The facility maintains a record on the capacity of the landfill. Annual acceptance records were reviewed as part of the records submitted in MAERS.
  3. Compliance – The facility maintains a record on the capacity of the landfill. Annual acceptance records were reviewed as part of the records submitted in MAERS. This record includes the Mg/year and short ton/ year of waste in place and accepted each year between 1974 and 2014.
  4. Compliance – The facility maintains records for the NMOC emissions. In 2014 the facility emitted less than 37 tons of NMOC.
  5. NA – No liquid is added to control the waste.
- VII. Reporting
1. Compliance – All deviations are reported promptly.
  2. Compliance – Semiannual deviation reports for the past year have been received on time. The reports have been received on March 11, 2015, and September 12, 2014. A detailed deviation report was included with this report.
  3. Compliance – The Annual ROP certification report was received on March 11, 2015. A detailed deviation report was included.
  4. NA- No equipment has been removed since the last inspection
  5. NA – No methane exceedances have been reported since the last inspection.
- VIII. Stack/Vent Restriction – NA
- IX. Other Requirements
1. NA – The landfill control system has not been removed.
  2. NA – The landfill is not closed.
  3. NA – Monitoring demonstrates compliance at this time.
  4. Compliance – The facility is using an approved collection and control system.

EUALGCS – This emission unit represents the active landfill gas collection system at the landfill. Gas mover equipment is used to draw landfill gas from the wells and deliver it to the control equipment.

- I. Emission Limits – NA
- II. Material Limits – NA
- III. Process/Operational Restriction – Compliance. The facility monitors the well heads on a monthly basis for temperature, pressure, and nitrogen or oxygen. If the facility is unable to resolve any exceedances within 15 days, the facility sends a report the MDEQ requesting an alternative operating scenario. A list of

- all wells operating at with an alternative operating scenario was included with the Annual ROP certification.
- IV. Design/Equipment Parameters – Compliance. The facility operates the gas collection system which has been properly designed for this site. When there is a need to install additional well, the facility will complete this task.
  - V. Testing/Sampling – NA
  - VI. Monitoring/Recordkeeping – Compliance. The facility monitors all wells on a quarterly basis for temperature, pressure, and nitrogen or oxygen. For any wells with exceedances, an alternative operating scenario is developed and approved by MDEQ.
  - VII. Reporting
    - 1. Compliance – All deviations are reported promptly.
    - 2. Compliance – Semiannual deviation reports for the past year have been received on time. The reports have been received on March 11, 2015, and September 12, 2014. A detailed deviation report was included with this report.
    - 3. Compliance – The Annual ROP certification report was received on March 11, 2015. A detailed deviation report was included.
    - 4. Compliance – The facility submits a semiannual report for the gas collection system. This report was last received on March 11, 2015. The report includes all well head exceedances as well as what action has been done.
    - 5. Compliance – The facility submits a start-up, shut-down, malfunction report semiannually. The last report was received on March 11, 2015.
  - VIII. Stack/Vent Restriction – NA
  - IX. Other Requirements
    - 1. Compliance – The facility preforms the required actions to resolve the well head exceedances.
    - 2. Compliance – The facility maintains a record of the start-up, shutdown or malfunctions.
    - 3. NA – The current collection system meets the specifications or alternative parameters.
    - 4. Compliance – The facility is maintains a SSM plan on site.

**EUASBESTOS – Any area of the landfill which receives asbestos waste.**

- I. Emission Limits – NA
- II. Material Limits – NA
- III. Process / Operational Restrictions – Compliance. The facility does not accept friable asbestos waste and has not accepted this type of waste since 2013. The facility does accept non-friable asbestos waste. The facility is notified before the asbestos waste arrives. The asbestos is put in the bottom of that days lift. The facility then covers the waste and keeps records of where this waste is located. Asbestos waste manifests are kept onsite. No visible emissions were observed during the onsite inspection, and no asbestos waste was being accepted during the onsite inspection.
- IV. Design / Equipment Parameters – Compliance. The facility has all of the active sites of the landfill on the landfill gas collection system.
- V. Testing / Sampling – NA
- VI. Monitoring / Recordkeeping – Compliance. The facility maintains asbestos waste manifests onsite. These contain the name, address, and contact information for

the waste generator as well as the waste transporter. The facility keeps a record of where the asbestos waste is stored onsite.

VII. Reporting

1. Compliance – The facility has submitted timely deviation reports. The last report was received on March 11, 2015.
2. Compliance – The facility has submitted timely annual ROP certification. The last report was received on March 11, 2015.
3. Compliance – The facility has submitted timely semiannual ROP certification. The last report was received on March 11, 2015
4. NA – The facility has not closed an asbestos containing section of the landfill since the last inspection.
5. Compliance – During my onsite inspection, all records were readily available for me to review.
6. Compliance – During the past year, MDEQ received a notice on August 7, 2015 regarding a new well that was being added in an area of the landfill where asbestos had been accepted.

VIII. Stack / Vent Restrictions – NA

IX. Other Requirements – NA

FGOPENFLARES – Two open flares designed to combust and destroy gas production by the MSQ Landfill.

- I. Emission Limits – Compliance. The facility emitted less than 35 tons of CO in 2014, which is less than the limit of 222 tons of CO per 12-month rolling time period.
- II. Material Limits – NA
- III. Process / Operational Restrictions – Compliance. The facility operates both flares according to these requirements. There is a continuous pilot in both flares.
- IV. Design / Equipment Parameters – NA
- V. Testing / Sampling – Compliance. The facility performed a stack test on the flares on May 21, 2002, August 26, 2011 and February 2, 2012, which was within 180 days of the initial start-up of each of the flares.
- VI. Monitoring / Recordkeeping – Compliance. The facility maintains all records onsite for the flares.
- VII. Reporting – The ROP annual and semiannual certification reports have been received in a timely manner for the past two years. The last annual and semiannual ROP certification reports were received on March 11, 2015.
- VIII. Stack / Vent Restrictions – Compliance. The stack for one flare has a height of 30 feet above ground level and the stack for the other flare has a height of 45 feet above ground level. The third stack height was for the portable flare that is no longer at the facility.
- IX. Other Requirements – Compliance. The last performance test occurred on February 2, 2012. The facility continuously monitors the flare, and maintains a constant lit pilot.

FGCOLDCLEANERS – Any cold cleaner that is grandfathered or exempt from Rule 201.

- I. Emission Limits – NA
- II. Material Limits – The facility operates one cold cleaner, which uses Safety Kleen chemicals, which is mostly mineral spirits and contains no HAPs.

- III. Process / Operational Restrictions – Compliance. The coldcleaner is maintained by Safety Kleen. No parts were observed being cleaned during the onsite inspection.
- IV. Design / Equipment Parameters – Compliance. The cold cleaner was designed to meet all the design requirements of this condition.
- V. Testing / Sampling – NA
- VI. Monitoring / Recordkeeping – The facility maintains a description of the chemicals used in the cold cleaner, including chemical characteristics. During the onsite inspection, the lid of the cold cleaner was closed and operation procedures were listed near the unit.
- VII. Reporting – The ROP annual and semiannual certification reports have been received in a timely manner for the past two years. The last annual and semiannual ROP certification reports were received on March 11, 2015.
- VIII. Stack / Vent Restrictions – NA
- IX. Other Requirements – NA

FGRULE290 – Any emission unit emitting air contaminants and exempt from Rule 201. The facility indicated that they do not operate any equipment that would be consider exempt from permitting based on Rule 290. Therefore these conditions were not evaluated.

#### MAERS REPORT REVIEW

The MAERS report for this facility was received on March 11, 2015 and was reviewed on May 29, 2015. The report appears to have been completed accurately.

#### FINAL COMPLIANCE DETERMINATION

Sauk Trail Hills Development appears to be operating in compliance with the current ROP, MI -ROP-N6009-2012. The facility also appears to be operating in compliance with all state and federal regulations.

NAME J.P. Zimmerman DATE 9/24/15 SUPERVISOR JK