

N6009
MANILA

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

N600941532

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, ENVIRONMENTAL MANAGER		ACTIVITY DATE: 08/17/2017
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : August 17, 2017
 TIME OF INSPECTION : 11:00 am
 LEVEL OF INSPECTION : II
 NAICS CODE : 562212
 EPA POLLUTANT CLASS : NMOC
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Christina Pearce, Environmental Manager
 Farid Abuchaibe, General Manager Detroit Post-Collection
 Connor Haydon, Environmental Specialist
 Dana Oleniacz, Air Quality Specialist, Inc.

FACILITY PHONE NUMBER : 734-231-8217
 EMAIL CONTACT : cpearse@republicservices.com
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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 1974. 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 2013. 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 since 2013.

INSPECTION NARRATIVE

I arrived at the facility and met with Ms. Christina Pearce, Farid Abuchaibe, Connor Haydon, and Ms. Dana Oleniacz as well as Mr. Steve Smith from Canton Renewables, the gas to energy plant located at the site and utilizing landfill gas. Together we discuss the landfill and any changes that had occurred since the last inspection. The landfill currently is accepting solid waste. The facility is able to 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 can also accept friable asbestos waste, though it has not collected this type of waste since September 2013. We also clarified the higher operating values for submitted for some of the monitoring wells. The facility is currently collecting waste in Cell G.

The facility was informed that during the renewal process for the ROP, Sauk Trails and Canton Renewables will be combined as one source with one SRN. Sauk Trails will be considered section one and Canton Renewables will be considered section two.

Landfill gas is collected through a system of wells throughout the landfill. This gas is sent to Canton Renewables, where it is treated and sold to a third party. 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. Surface monitoring of the monitoring wells was last performed on June 6, 2017, with two high readings.

After discussing the landfill operations, we took a site tour of the facility. We drove to the top of the active cell. 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. No odors were detected off site of the landfill.

APPLICABLE RULES/PERMIT CONDITIONS

Sauk Trails is currently operating under ROP MI-ROP-N6009-2012. This permit was issued on July 26, 2012. The renewal ROP application was received on November 28, 2016.

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 the first quarter of 2017, there were 17 wells that exceeded the 500 ppm methane concentration. The facility requested and was granted alternative timeline for these wells, which was granted.
- 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 and reports are sent to DEQ.
 2. Compliance – The landfill gas is piped to Canton Renewables, which cleans the gas for resale. Any gas that is not processed by Canton Renewables is flared.
- V. Testing/Sampling
 1. Compliance – The facility performs quarterly surface methane monitoring. The last round of monitoring was performed on June 6, 2017.
 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.
- 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 capacity plan onsite that can be easily be reviewed. The facility plans to operate for about 10 to 15 more years.
 4. Compliance – The facility maintains records for the NMOC emissions. In 2016 the facility reports emitting less than 35.4 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 14, 2017, and September 11, 2017. A detailed deviation report was included with this report.
 3. Compliance – The Annual ROP certification report was received on March 14, 2017. A detailed deviation report was included.
 4. NA- No equipment has been removed since the last inspection
 5. Compliance – Methane concentrations are monitored on a quarterly basis. Any exceedances are reported and the technicians work to return the well to compliance. The last report was received on September 11, 2017.
- 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, which was received on March 14, 2017.
- 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 an 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 submitted to the MDEQ for approval.

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 14, 2017, and September 13, 2016. A detailed deviation report was included with this report.

3. Compliance – The Annual ROP certification report was received on March 14, 2017. 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 14, 2017. 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 September 11, 2017.

VIII. Stack/Vent Restriction – NA

IX. Other Requirements

1. Compliance – The facility performs 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 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 14, 2017.

2. Compliance – The facility has submitted timely annual ROP certification. The last report was received on March 14, 2017.
3. Compliance – The facility has submitted timely semiannual ROP certification. The last report was received on March 14, 2017
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 – The MDEQ receives proper notification before any work is done in the well field.

VIII. Stack / Vent Restrictions – NA

IX. Other Requirements – NA

FGOPENFLARES – Two open flares designed to combust and destroy gas production by the MSW Landfill. The temporary flare EUOPENFLARE3000 has been removed from the facility. The remaining flares, also known as East Flare and West Flare, remain active onsite.

- I. Emission Limits – Compliance. The facility emitted less than 60 tons of CO per 12-month rolling time period for at least the past 12 months, 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, which was within 180 days of the initial start-up of the flares.
- VI. Monitoring / Recordkeeping – Compliance. The facility maintains all records onsite for the flares.
- VII. Reporting
 1. Compliance – The facility has submitted timely deviation reports. The last report was received on March 14, 2017.
 2. Compliance – The facility has submitted timely annual ROP certification. The last report was received on March 14, 2017.
 3. Compliance – The facility has submitted timely semiannual ROP certification. The last report was received on March 14, 2017
- VIII. Stack / Vent Restrictions – Compliance – The flares are operating at the acceptable height. No changes to the height have been made since the last inspection.
- IX. Other Requirements – Compliance – Stack test was performed on the flares on May 21, 2002, and the facility was able to show compliance. The facility also maintains a SSM plan that appears to show that the flares are operating properly.

FGCOLDCLEANERS – Any cold cleaner that is grandfathered or exempt from Rule 201. Currently, the facility has one cold cleaner onsite.

- 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 cold cleaner 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 14, 2017.
- 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

This report was received on time. All the emissions appear to have been reported accurately. There was no throughput reported for EUCOLDCLEANER. I sent the company an email on May 26, 2017 for clarification on this equipment and why it was not used during 2016. On June 5, 2017 the company responded that the solvent used in this cold cleaner was water based.

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



DATE

9/24/17

SUPERVISOR

JK