

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

N326163133

FACILITY: GLEN'S SANITARY LANDFILL		SRN / ID: N3261
LOCATION: 518 E. TRAVERSE HIGHWAY, MAPLE CITY		DISTRICT: Cadillac
CITY: MAPLE CITY		COUNTY: LEELANAU
CONTACT: Deb Johnston , Environmental Engineer		ACTIVITY DATE: 06/07/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: 2022 FCE.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation 2022

I Inspected the Waste Management (WM) Glen's Landfill to determine compliance with ROP number MI-ROP-N3261-2021 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: overcast, temp. 50, northwest wind at 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. Gas collection wells collect landfill gas for use in the leachate evaporator. Excess gas is directed to a flare. The evaporator was not operating at the time of the inspection since maintenance was being performed (unplugging a valve at the bottom of the evaporator). The flare was operating at 270 scfm with a visible flame but no smoke or visible emissions.

The weather has been wet and the haul roads were well saturated, there was no fugitive dust. Most areas of this landfill have vegetative or artificial cover. The plant yard, and the active parts of the landfill had no noticeable visible emissions during the inspection and appeared to be in good repair. Leachate concentrate is occasionally 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 06/02/21. 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 16.97 MG/yr and projected to be 19.65 MG/yr in 2022. Therefore, only currently applicable permit conditions are addressed in this report.

FACILITY DESCRIPTION – Glen's Sanitary 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 currently 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. 40 CFR 62, Subpart OOO has similar applicability and compliance requirements. The facility is also subject to 40 CFR 61 Subpart M, 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 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 on September 29, 2021. The next Tier 2 test is Due September 29, 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. Differences were noted between the NMOC emission calculations from the Tier 2 test and the calculations submitted with the MAERS report. Glen's Landfill will update the MAERS calculations prior to the next submittal.

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)(I).

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 documenting the information by maintaining a binder with a record (shipping manifest) of each waste shipment received which contains this information. 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. Log style records of the asbestos waste location, depth(elevation) and quantity are included in the binder.

Asbestos waste shipment and placement records were complete and up to date. Five shipments have been received 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 emissions from the evaporation of leachate (not fuel combustion) and Groundwater Remediation System. The Leachate system is exempt under Rule 285(aa). The groundwater remediation system has been shut down since contaminant levels have been non-detect. Monitoring continues and the remediation system could be restarted if necessary.

I. EMISSION LIMITS – There are currently no emissions from the remediation system. EUEVAPORATOR emissions are determined through annual calculations submitted with the MAERS report. NMOC emissions were below the 1000 lbs/mos. Uncontrolled emission rate required by Rule 290.

VI. MONITORING/RECORDKEEPING – The remediation system is not currently operating but records have been maintained in the past of the flow rate to the system and the HAP concentrations of the water. All HAPs were considered to be emitted for the purpose of the calculations. EUEVAPORATOR emission calculations are based on air flow, operating hours, landfill gas lower heating value (LHV) and MAERS emission factors.

FGCOLDCLEANERS

There is one cold cleaner on site that is a small mineral spirits parts cleaner with built in still to recycle the solvent. This cold cleaner is serviced by Safety Kleen. It was closed at the time of the inspection and 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 and inspection follow-up, the AQD believes the facility is currently in compliance with ROP MI-ROP-N3261-2021, the Asbestos NESHAP, and 40 CFR 60 Subpart WWW.

NAME  _____

DATE _____

SUPERVISOR _____