

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

N561963951

FACILITY: Pitsch Sanitary Landfill		SRN / ID: N5619
LOCATION: 7905 Johnson Rd, BELDING		DISTRICT: Grand Rapids
CITY: BELDING		COUNTY: IONIA
CONTACT: Ross Young , Site Manager		ACTIVITY DATE: 08/04/2022
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 9:00 AM on August 4, 2022, Air Quality Division staff Dave Morgan conducted a scheduled inspection at the Pitsch Sanitary Landfill (PSL) located at 7905 Johnson Road in Belding. The purpose of the visit was to determine the facility's compliance with state and federal air pollution regulations. Accompanying AQD staff on the visit was Ross Young, Site Manager.

FACILITY DESCRIPTION

The PSL is a municipal solid waste landfill located in Belding, in Ionia County, Michigan. The PSL has a design capacity greater than 2.5 million cubic meters and accepts more construction/demolition material than municipal waste. The facility consists of solid waste disposal Cells 1 through 4 which are capped and closed and Cells 5 through 8 which are permitted and active. There is also a closed Act 87 area that began operations in 1975 and ceased operations in 1992. The company completed installation of a landfill gas collection and control system (GCCS) to control non-methane organic compound emissions (NMOC) in August 2009 to comply with landfill rules at the time.

The landfill is subject to the federal plan requirements under 40 CFR Part 62, Subpart OOO as well as requirements under 40 CFR Part 61, Subpart M for asbestos. Renewable Operating Permit (ROP) No. MI-ROP-N5619-2020b was issued on July 19, 2022 in order to incorporate new applicable requirements under Subpart OOO and to remove obsolete requirements related to 40 CFR Part 60, Subpart WWW. Under the new requirements of Subpart OOO, gas collection and control is no longer required at the site.

COMPLIANCE EVALUATION

(EULANDFILL<34):

Upon arrival at the facility, AQD staff, surveilled for odors along Kiddville Road which is along the northern boarder of PSL. Strong landfill gas odors were observed just north of the landfill where Cell 5 overlays Cell 2. No odors were detected at any residential properties along Kiddville Road. Although there is a presence of landfill gas odors, neither the AQD nor PSL, according to Mr. Young, have received any odor complaints. It is noted that under the ROP, Table EULANDFILL<34, Condition III.1, an Odor Management Plan is required to be submitted by September 2, 2022.

Gas collection and control is required for PSL if the annual or five year estimated NMOC emission rate is greater than 34 MG/year. PSL uses the Tier II sampling and calculations in the rule to determine verify the NMOC emission rate from the site. The last Tier II test was conducted in July 2021. At that time, the NMOC concentration was determined at 34 ppmv as hexane with a maximum projected NMOC generation rate for the next 5 years of 3.19 Mg/year which is below the 34 Mg/year threshold. Another Tier II test will not be required until 2026.

It is noted that although gas collection and control is not required, some of the spark flares on the passive vents continue to burn. PSL does not monitor the flares, but does minor maintenance.

Records pertaining to maximum design capacity, year-to-year acceptance rate, and amount of waste in place are maintained by the company in accordance with the ROP. This information is also reported to the EGLE, Materials Management Division on a quarterly basis. As of September 2021, the site had less than 2.0 million cubic yards of waste in place which is well below the permitted capacity of 6.48 million cubic yards. As of September 2021, PSL accepted approximately 235,396 cubic yards of waste, (182,374 yd³ was industrial/demolition/construction waste and 52,690 yd³ was municipal consumer waste). Waste records obtained on site indicate from August 2021 through July 2022 that 124,854 tons of waste was received.

Reporting:

PSL has submitted ROP certification reports in accordance with the ROP.

EUASBESTOS:

The PSL actively accepts asbestos containing waste. From August 2021 through July 2022, records show that 1,042 tons of friable and non-friable asbestos waste were received. Asbestos manifest records were reviewed on site. The asbestos records contained the name, address and telephone number of the generator and transporter as well the amount of asbestos containing waste.

In response to an AQD Violation Notice sent on February 4, 2022, asbestos containing waste is currently being placed into a designated pit on the edge of Cell 5 and Cell 6. The pit is approximately 50 ft deep and was marked with barrels that had asbestos warning labels. Upon inspection of the pit, bags and other forms of asbestos waste were observed without daily cover. It is noted that the material was wet as it had rained the night before the inspection. Upon review of asbestos manifest records it was determined that bags of asbestos waste were received on August 1st which was 3 days prior to the inspection. Since the waste in the pit was not covered with compacted non-asbestos-containing cover material at the end of the operating day a violation of ROP No. MI-ROP-N5619-2020b, Table EUASBESTOS, Condition III.1.c will be cited. PSL is maintaining a map of deposited asbestos waste.

No visible emissions were observed from the active disposal area.

SUMMARY

PSL is in non-compliance for the items identified above. Records are attached.



Image 1(Asbestos Disposal 1) : Asbestos Disposal 1



Image 2(Asbestos Disposal2) : Asbestos Disposal2



Image 3(Asbestos Disposal3) : Asbestos Disposal3



8/25/2022



NAME _____

DATE _____

SUPERVISOR _____