

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

N598851068

FACILITY: CITY ENVIRONMENTAL SERVICES INC OF WATERS		SRN / ID: N5988
LOCATION: 11375 SHERMAN RD, FREDERIC		DISTRICT: Cadillac
CITY: FREDERIC		COUNTY: CRAWFORD
CONTACT: Deb Johnston , Environmental Manager		ACTIVITY DATE: 10/17/2019
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: 2020 FCE		
RESOLVED COMPLAINTS:		

**Full Compliance Evaluation 2020**

I Inspected the City Environmental Waters Landfill to determine compliance with ROP number MI-ROP-N5988-2015 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: overcast, temp. 40, NNW wind 10 mph.

Prior to entering the facility, I observed that there were no odors outside of the facility. No odors were detected inside the facility during the inspection except for immediately downwind of the active area. Gas collection wells collect landfill gas for use in the leachate evaporators. Excess gas is directed to a flare. The evaporators were operating at the time of the inspection, there was a steam plume but no visible emissions. The flare was also operating with a visible flare but no visible emissions. The plant roads, yard, and the active parts of the landfill had no noticeable visible emissions during the inspection and appeared to be in good repair. Most of the roadways are paved and the remaining areas were vegetated or well saturated with rain. Leachate concentrate is recycled into the landfill and serves a dust control function on the active part of the landfill. Excess leachate is stored in a tank and hauled to an injection well for disposal.

The ROP for this facility was renewed on 10/20/2015. The majority of ROP permit conditions associated with this facility only apply once the facility has reached a non-methane organic carbon (NMOC) emissions threshold of 50 Megagrams per year based on testing. Based on the most recent testing from 2016 the facility has not exceeded that threshold, the current NMOC emission rate is 22.73 MG/yr. Therefore, only applicable permit conditions are addressed in this report.

**FACILITY DESCRIPTION** – The Waters 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 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. The facility is also subject to the 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 27, 2016. The next Tier 2 test is due by September 27, 2021.

**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 2018 MAERS submittal was reviewed and determined to be adequate. The NMOC emission calculations, waste acceptance records, evaporator and flare emissions are attached.

**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). Asbestos disposal locations are mixed in with general waste disposal but are identified by GPS coordinates. This information is referenced when installing any future gas wells.

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 adequately documenting the information by maintaining a binder with a record of each waste shipment received. 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. There have been 20 shipments in 16 locations so far in 2019.

FGRULE290 – This flexible group is for emission units that are exempt from the requirements of Rule 201 pursuant to Rule 290. This includes HAP emissions from the evaporation of leachate (not from fuel combustion). The Leachate system is exempt under Rule 285(aa).

I. EMISSION LIMITS – Evaporator HAP emissions are evaluated by required emissions calculations submitted in the annual MAERS report.

VI. MONITORING/RECORDKEEPING – Evaporator emissions are calculated by using airflow, operating hours, landfill gas lower heating value (LHV) and MAERS emission factors

Emissions calculations submitted with the 2018 MAERS report indicate NMOC emissions are less than the 1,000 lbs/month limit under Rule 290 (NMOC 711.32 lbs in 2018).

FGCOLDCLEANERS

There is one cold cleaner on site that is a small (<10 sq.ft.) parts cleaners serviced by Safety Kleen. The lid was closed and the unit was well marked with the operating procedures.

EVALUATION SUMMARY – Based upon the on-site inspection and records review, the AQD believes the facility is in compliance with ROP MI-ROP-N5988-2015, the Asbestos NESHAP, and 40 CFR 60 Subpart WWW at this time.

NAME 

DATE 10.18.19 SUPERVISOR 