

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

N602871063

|  |                                      |                                  |
|--|--------------------------------------|----------------------------------|
| <b>FACILITY:</b> GFL North Michigan Landfill O/A Elk Run |                                      | <b>SRN / ID:</b> N6028           |
| <b>LOCATION:</b> 20667 5 MILE HWY, ONAWAY                |                                      | <b>DISTRICT:</b> Gaylord         |
| <b>CITY:</b> ONAWAY                                      |                                      | <b>COUNTY:</b> PRESQUE ISLE      |
| <b>CONTACT:</b> Chris Gee , Operations Manager           |                                      | <b>ACTIVITY DATE:</b> 03/08/2024 |
| <b>STAFF:</b> David Bowman                               | <b>COMPLIANCE STATUS:</b> Compliance | <b>SOURCE CLASS:</b> MAJOR       |
| <b>SUBJECT:</b> FY24 scheduled inspection                |                                      |                                  |
| <b>RESOLVED COMPLAINTS:</b>                              |                                      |                                  |

On 8 Mar 2024 I, David Bowman MI EGLE AQD, conducted a site inspection of Green For Life (GFL) North Michigan Landfill Elk Run Landfill SRN N6028, operating under the conditions of MI-ROP-N6028-2019. The site is located approximately 5 miles south of Onaway on 5 Mile rd, east of M33. Five-mile Road dead ends at the gate to the landfill. The land surrounding the landfill is rural and comprised of several residential homes and agricultural properties. The nearest residential dwelling is approximately 200 meters due west of the entrance to the facility. The weather at the time of inspection was approximately 33°F, winds were calm, and the sky was clearing. There was a level one odor of trash on the property, but nothing that I noticed outside of the gate. The site appeared to be maintained and had controlled access. There was no indication of spills or issues that was noted. The fence was intact and there is a gate used to control access.

Near the gate there is a lay down yard for GFL roll off boxes. I did not observe any box to have any contents. The yard was orderly, and I did not detect any odors at it.

The source has submitted the application for ROP renewal, and it was determined to be administratively complete 16 Jan 2024. The ROP central unit is completing the renewal. This inspection is based upon the conditions of the current ROP and not the recommended changes in the ROP renewal. Due to the nature of the regulations that apply to this source there is no source wide permit to install (PTI). All the regulations that apply to the source are federal and no equipment has been installed under the Michigan Air Pollution Control Rules that would require a PTI.

The landfill is a Type II sanitary landfill, with a design capacity of 2.7 million cubic meters. The facility accepts municipal solid waste (MSW), inert wastes, and minimal amounts of asbestos containing waste. The MSW is transported to the facility to an area (cell) where it is deposited on to the working face (aka tipping face). Over time, the waste decomposes producing landfill gas (LFG). The LFG is comprised of methane, carbon dioxide, and volatile organic compounds (VOCs). MSW initially undergoes aerobic microbial activity producing predominately nitrogen gas and carbon dioxide. As oxygen levels decline, gas composition changes to a mixture of methane and carbon dioxide. LFG typically contains a small percentage of non-methane organic compounds (NMOC). The NMOC fraction consists of various organic hazardous air pollutants (HAPs), green house gases (GHG), and VOCs. The facility received a Solid Waste Disposal Area Construction Permit to increase the landfills capacity on 18 June 2001.

The facility is currently subject to the following federal standards:

- Emission Guidelines for existing Municipal Solid Waste Landfills promulgated under 40 CFR Part 60, Subparts A and Cf

- Federal Plan Requirements for Existing Municipal Solid Waste Landfills promulgated under 40 CFR Part 60 Subpart OOO. The current ROP references subpart WWW as the required regulation. The inspection referenced the requirements of Subpart WWW from the current ROP. The requirements for WWW and OOO have been met by the source.
- National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 Subpart A and M.

**There are no source wide conditions nor any flexible groups at the source. There are two emission units (EUs):**

| Emission Unit ID | Emission Unit Description<br>(Including Process Equipment & Control Device(s))   | Installation Date/<br>Modification Date |
|------------------|--|---|
|                  |  |   |
| EULANDFILL<50    | This emission unit is a Type II Sanitary Landfill, with a design capacity of 2.7 million cubic meters, and accepts municipal solid waste (MSW), inert wastes, and a minimal amount of asbestos containing waste. Actual Non-Methane Organic Compound (NMOC) emissions based upon an established Tier 2 value is less than 50 megagrams per year. The facility received a Solid Waste Disposal Area Construction Permit to increase the landfill's design capacity on June 18, 2001. LFG is currently not being collected. However, the facility is currently operating several passive solar flares for odor control. Because the landfill was modified after May 30, 1991 and the design capacity is now above 2.5 million megagrams, the landfill is subject to 40 CFR Part 60, Subpart WWW. | 07-18-1992/                             |
|                  |  | 06-18-2001                              |
| EUASBESTOS       | This emission unit represents any active or inactive area within the landfill which has accepted asbestos waste.   | 07-18-1992/                             |
|                  |  | 06-18-2001                              |

#### **EULANDFILL<50**

There are no emission controls for EULANDFILL<50, controls are not required. There was no more than the normal amount of paper and light debris outside of the tipping face and there were personnel actively recovering this debris that had blown off during the tipping process. There was adequate wind screening at the tipping face observed. I did not see any material blown off the source property. There was plenty of material present that could be used for daily cover and only the working area was open to receive.

#### **V. Testing/Sampling**

##### **2. The permittee shall perform Tier 2 testing at least once every five years...**

Discussion Tier 2 testing was completed May 2,3, and 26 2023. The test results (reviewed in a separate report) indicate an estimated NMOC emission rate of 17.99 Mg/year. Therefore, there is no requirement to install a Gas Collection and Control System (GCCS). The source has voluntarily installed a system that has been active since approximately August of 2022. The source is continually improving and upgrading the GCCS. At the time of the inspection, they were in process of adding additional storage tanks and upgrading the system. There is a focus

on, where possible, to add LFG to power at GFL landfills. Elk Run is on the list for an upgrade in the future.

### **EUASBESTOS**

There are no emission controls for EUASBESTOS, controls are not required. At the asbestos tipping face there was no observed material outside of the ground, there was wind screen present to ensure that any debris would not blow off this face. There was adequate cover material present to ensure that any asbestos received would be covered.

### **III. Process/Operational Restrictions**

1. If a landfill accepts asbestos containing waste...

**Discussion – We drove to the asbestos material receiving and disposal area of the landfill. There were no visible emissions, and the area was covered by several inches (at least 6-8" in areas that were observed) of soil for cover. The vast majority of all asbestos containing material is delivered via GFL trucks with small portions, if any at all, delivered by residents. Records relating to the receiving of the asbestos have previously been reviewed. The entire perimeter of the facility is protected by a 6-foot fence, with triple strand barbwire along the top, that surrounds the property with controlled access at the gate. The asbestos receiving site is relatively close to center of the facility and this part of the working face can be seen by the operators on the site. Proper safety signage is also present. These measures are sufficient to keep the general public away from the area.**

NAME



DATE

5-9-24

SUPERVISOR

