

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

N236936053

FACILITY: ADRIAN LANDFILL		SRN / ID: N2369
LOCATION: 1970 NORTH OGDEN HWY, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Robb Moore, Environmental Manager		ACTIVITY DATE: 07/15/2016
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled, announced inspection of MI-ROP-N2369-2014 at Adrian Landfill. Alex Whitlow, OWMRP, was present to perform a quarterly inspection, as well.		
RESOLVED COMPLAINTS:		

Contact

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Purpose

I arrived at Adrian Landfill at about 10:30am on July 15, 2016 with Alex Whitlow, of the Office of Waste Management and Radiological Protection (OWMRP). This was a scheduled, announced inspection of the facilities and equipment listed in the Renewable Operating Permit (ROP) No. MI-ROP-N2369-2014 issued to Adrian Landfill, Inc. The purpose of this inspection was to determine compliance with the federal and state applicable requirements, including Act 451, Part 55, Air Pollution Control regulations and conditions of their ROP. I met with two representatives from Republic Services, Robb Moore and John Bolyard, whom are responsible for overseeing operations at this site. The inspection consisted of a driving tour around the perimeter of the landfill property, equipment inspection, records request, as well a brief walk onto the landfill where an intermediate cover appeared eroded.

Background

Adrian Landfill has not accepted waste since 2013 and has no plans to begin accepting waste within the next 12 months. Current operations at the site include leachate handling, air stripper operation, landfill gas (LFG) collection, surface monitoring, and occasional LFG flaring. Flaring occurs when the gas-to-energy plant, Adrian Energy (SRN: P0426), is down for maintenance or otherwise unable to handle LFG at their building, which is also located on the same contiguous property.

The Air Quality Division (AQD) received three complaints in February and March 2016 from the area with each report citing odors coming from the landfill. Until these more recent complaints, the last complaint was received in 2012. Also nearby is a Waste Water Treatment Plant.

This landfill is subject to the regulations under the New Source Performance Standards (NSPS) in 40 CFR Part 60, Subpart WWW for Municipal Solid Waste (MSW) Landfills. Additionally, the landfill is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63, Subpart AAAA for MSW Landfills.

Compliance Evaluation**EULANDFILL**

This is the emission unit (EU) which contains the permit conditions for the general MSW Landfill, in which LFG is sent primarily to a treatment system. A collection system routes the LFG to the treatment system owned and operated by Adrian Energy, as required by the Design/Equipment Parameters as written in Special Condition

(SC) IV.2c of this EU. Additionally, the flare serves as a backup to the treatment system, and satisfies SC IV.2a.

SC V.2 outlines the required testing on a quarterly basis for surface monitoring of the landfill for organic vapors. Attached are the first two quarters of surface monitoring for 2016; performed on March 11 and May 19, 2016. The first quarter of 2016 reported one exceedance of the 500ppm limit and had to undergo retesting, during which time no further exceedances were found.

EUACTIVECOLL

This is the EU associated with the gas collection system that moves the LFG to control equipment (i.e. treatment system or flare). The facility is required to monitor each well for the following parameters and their respective limits: pressure (negative), temperature (<55°C), and oxygen (<5%). Robb provided me with the last 12 months of data for each well that includes the necessary monitoring metrics. Attached is a sample of the data they have been collecting. Note that the temperature in their log is in degrees Fahrenheit as opposed to Celsius, but there have been no instances where 55°C is reached. There are some cases where pressure or oxygen readings are higher than their permitted amount, however, subsequent data from the following months suggests that corrective actions were taken since values appear to realign to within their limits. These exceedances are reported semi-annually in their ROP Certification reports.

Also attached, as required by SC.VI.7 of this EU, is an up-to-date map showing all existing collection system components.

EUOPENFLARE

This is the EU for the flare that serves as backup control during times when the gas-to-energy plant is not operational. The flare was not currently operating because LFG was being routed to the gas plant adjacent to the landfill. Per the attached email from Robb, the flame arrestor is cleaned annually, and the flare operates on a monthly basis or when the gas plant has an outage. Also attached is a partial data log for June 2016, which records flare operations minute by minute (Note: this document has been excerpted to show an instance of operation while LFG was being routed to the flare). This document appears to satisfy requirements of NSPS WWW and NESHAP AAAA.

EUASBESTOS

This is the EU that includes conditions regarding asbestos-containing materials that have been collected or will be collected, and their proper handling and reporting. The landfill has been submitting the necessary notifications to AQD for excavation and disturbances of asbestos containing waste. Their most recent submittal is dated 7/19/16, and previously on 8/6/15.

EUAIRSTRIPPER

This is the EU for the purge water treatment system using an air stripper to treat groundwater extracted at the closed portion of the landfill to remove volatile organic compounds (VOC). Attached are the records of flow rate, influent and effluent VOC concentration, and 12-month rolling emissions. Through June 2016 the 12-month rolling emissions was 0.062 pounds of VOC, which is much lower than the limit of 0.003 tons per year (6 pounds).

FGCOLDCLEANERS

This is a flexible group that accounts for any cold cleaner that is installed on site. A cold cleaner was previously used in the maintenance area while still actively accepting waste; however, it has since been removed. This was also noted during the last inspection in 2014.

Summary

Alex Whitlow and I arrived at the site where John Bolyard was waiting to open the gate for us. We drove to the building meant for office space and also met with Robb Moore. Alex and I introduced ourselves and went over the purpose of each of our visits. I provided John and Robb with an Environmental Inspection brochure and walked them through what they should expect from the inspection. We determined that it would be best to take a perimeter tour of the facility in a vehicle and stop along the way to observe the equipment we both needed to see. We stopped several times during the drive for Alex to conduct his quarterly inspection of the leachate

collection system and other OWMRP activities. We also stopped at the air stripper unit and flare during the course of the perimeter drive. I also utilized the drive to observe any unusual features on the face of the landfill that might indicate maintenance or repair was required (i.e. dead vegetation, erosion, etc.).

Following the facility tour and upon arriving back at the office building, I began to discuss with Robb the record keeping documents I needed to see. We entered the building and proceeded to the room where files were kept. I requested records concerning emissions, maintenance, and monitoring. Robb took notes on which documents I was interested in so he could provide them to me via email. We all exited the building and Robb and John left.

Alex and I decided to approach the landfill at an area where it appeared to have some erosion on the surface. The area we walked over was in Cell 3A. While in the area, we observed some surface cracks, and Alex informed me that this was an area with an intermediate cover, and not a final cap. I observed some faint odors that I would identify as LFG. After a few minutes we descended from the face of the landfill and proceeded in the direction of the gas plant owned by Adrian Energy. Along the way we encountered John Bolyard again and told him of our observation in the area of Cell 3A. Alex told him the intermediate cover might require some maintenance, and John replied that he would do so.

We then headed to Adrian Energy so that I could conduct an inspection of the treatment system and engines combusting LFG as fuel.

Compliance Determination

After an on-site inspection, records request, and MAERS auditing, I have determined that this facility is in compliance with MI-ROP-N2369-2014.

NAME Eric Dunbar DATE 3/22/16 SUPERVISOR 