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

N326135270		
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: 06/24/2016
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: 2016 FCE.		· · · · · · · · · · · ·
RESOLVED COMPLAINTS:		

Full Compliance Evaluation 2016

I Inspected the Waste Management (WM) Glen's Landfill to determine compliance with ROP number MI-ROP-N3261-2015 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: clear, temp. 72, SE wind 5 mph.

Prior to entering the facility, I observed that there were no odors downwind and outside of the facility. No odors were detected inside the facility during the inspection. Gas collection wells collect landfill gas for use in the leachate evaporator. Excess gas is directed to a flare. The evaporator was operating at the time of the inspection but there were no visible emissions. The flare was not operating. Overall gas production from the landfill has gone down over the last several years. The weather has been dry and the haul roads were fairly dusty. Dust suppressant application is scheduled for July 8, 2016, water is as also applied as needed by Glen's staff. 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 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 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. The facility has not exceeded that threshold. Therefore, only 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 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:

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 in December 2011. The next Tier 2 test is scheduled for September 28, 2016.

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 2015 MAERS submittal was reviewed and determined to be adequate. The NMOC emission calculations 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.

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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 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. Log style records of the asbestos waste location, depth and quantity are included in the binder. There were 9 asbestos shipments in 2015 and 3 so far in 2016.

<u>FGRULE290</u> – This flexible group is for emission units that are exempt from the requirements of Rule 201 pursuant to Rule 290. The Leachate system is actually 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.

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

FGCOLDCLEANERS

There is one cold cleaner on site that is a small parts cleaners serviced by Safety Kleen. It appeared in good repair and the cover on it was closed. No odors were noted around the unit and housekeeping around it was good.

EVALUATION SUMMARY – Based upon the on-site inspection and records review, the AQD believes the facility is in compliance with ROP MI-ROP-N3261-2015, the Asbestos NESHAP, and 40 CFR 60 Subpart WWW.

DATE 6-30 -/ GUPERVISOR

http://intranet.deq.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=2458... 7/6/2016