

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

N329426506

FACILITY: Ottawa County Farms Landfill		SRN / ID: N3294
LOCATION: 15550 68th Ave., COOPERSVILLE		DISTRICT: Grand Rapids
CITY: COOPERSVILLE		COUNTY: OTTAWA
CONTACT: Debbie Nurmi, Environmental Manager		ACTIVITY DATE: 08/01/2014
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 9:30 A.M. on August 1, 2014, Air Quality Division staff Dave Morgan conducted a scheduled inspection of the Ottawa County Farms Landfill located in Coopersville. The purpose of the inspection was to determine the facility's compliance with Renewable Operating Permit No. MI-ROP-N3294-2013 and state and federal air pollution regulations. Accompanying AQD staff on the inspection of the Ottawa County Farms Landfill was Debbie Nurmi, Environmental Manager, and Rob Carr, Site Manager.

#### FACILITY INFO

The Ottawa County Farms Landfill (OCFL) is a municipal solid waste landfill, with a design capacity of 13.0 million cubic meters, subject to the requirements of 40 CFR Part 60, Subpart WWW. The landfill is also subject to the National Emission Standard for Hazardous Air Pollutants under 40 CFR Part 63, Subpart AAAA for Municipal Solid Waste Landfills. Because the Non-methane Organic Compound (NMOC) emissions exceed 50 megagrams per year OCFL is required to have a gas collection and control system in place. Currently gas from closed and active portions of the landfill are collected by an active gas collection system and directed to the Ottawa Generating Station (OGS) where internal combustion engines burn the landfill gas to produce electricity. Excess gas is used by Resource Recovery Corporation (RRC) to recover metal and sand from used foundry sand. The OCFL and OGS are considered one stationary source, despite having two separate ROPs. RRC is not considered part of the stationary source.

#### COMPLIANCE EVALUATION

##### (EULANDFILL & EUALGCS/FGLGCS):

As stated, the landfill has an active landfill gas collection and control system on both closed and interim cover areas. The NSPS and ROP require that each interior wellhead be operated with a landfill gas temperature less than 131°F and a nitrogen level less than 20% or oxygen (O<sub>2</sub>) level less than 5% and monitored monthly. If a well exceeds one of these operating parameters, action is to be initiated to correct the exceedance within 5 calendar days. If the exceedance is not corrected within 15 calendar days of the first measured exceedance, then the gas collection system is to be expanded within 120 days of the initial exceedance to correct the problem. OCFL uses SCS Field Services to conduct well monitoring/tuning and well maintenance on a monthly basis as required by the NSPS and ROP. At a minimum, the vacuum pressure, O<sub>2</sub> concentration and temperature at each wellhead is monitored and recorded.

According to company records from August 2013 to July 2014 wells PW2, PW9A., PW26, W17R, and W26 had O<sub>2</sub> exceedances that occurred beyond the 15 day re-monitoring period. Many of these wells were either approved for abandonment and/or redrilled. There were additional wells above 5% O<sub>2</sub>, but these were largely associated with the leachate collection system and had prior approval from AQD for a higher O<sub>2</sub> operating value.

It is noted that the company submits well monitoring data to the AQD-Grand Rapids District on a monthly basis.

The surface concentration of methane is monitored on a quarterly basis in accordance with the NSPS and ROP. A map was provided which showed the route of sampling for each monitoring event. During 2013 and 2014, there was one quarterly surface monitoring report which indicated initial methane concentration readings were above 500 ppm. This surface monitoring exceedance was the result of a cracked manhole. No additional exceedances were found at this location after making necessary repairs and re-monitoring within 10-days. The company reported a deviation for not conducting the additional 30 day monitoring in a timely manner. Once this was discovered, the company notified AQD. Because the known cause of the surface emissions was repaired no further action was taken by AQD. The area was re-monitored during the subsequent quarter and found to be in compliance. According to company records, all calibration was conducted prior to each surface monitoring event in accordance with the NSPS and ROP.

Records pertaining to maximum design capacity, year-to-year acceptance rate, and amount of waste in place are

maintained on site in accordance with the NSPS. AQD staff reviewed these records on site. As of April 2014 there were 21,842,847 cubic yards of waste in place at the site. The company has a permitted capacity of 26,740,000 cubic yards.

Enclosed Flare (EUENCLSDFLARE):

In 2008 a 3,700 scfm enclosed flare was installed to ensure that the landfill maintains compliance with the control requirements of the NSPS should the Ottawa Generating Station shutdown. The flare is only used as backup, but Granger personnel operate the enclosed flare roughly twice per month for the OCFL. Each time the enclosed flare is fired-up, a startup report is created by Granger and sent to OCFL.

An initial performance test was conducted in November 2009 to verify the reduction efficiency for NMOC in accordance with applicable permit and NSPS requirements.

The company is keeping records of the 12-month rolling carbon monoxide (CO) emission rate, the landfill gas usage rate and the average Btu content of the landfill gas burned. According to company records for the period from August 2013 to July 2014, the CO emission rate was 0.22 tons (which is below the 97.3 ton permit limit), the total landfill gas burned was 4.1 million cubic feet, and the average heat input was 2,111 million Btu.

The equipment has a flow device which monitors gas flow as well as a heat sensing device to monitor the presence of the flame when it is operated. The company previously reported a deviation which documented a malfunction of the flow monitor. This device has been repaired.

Asbestos Waste (EUASBESTOS):

OCFL continues to accept asbestos waste which is placed in designated locations within the landfill. The asbestos waste is placed in columns to eliminate the need to disturb those areas. The company also surveys the asbestos waste in the landfill for each lift of asbestos waste to get the best dimensional picture of the waste location. This is all conducted in accordance with the ROP. The landfill maintains all required asbestos shipment records, which were reviewed on-site, in accordance with the ROP.

From July 2014 to August 2014 there were 2,358 cubic yards of friable-asbestos waste and 3,083 cubic yards of non-friable asbestos waste received.

Cold Cleaner (EUCOLDCLEANER):

The company has one small maintenance cold cleaner in which no non-compliance issues have been identified.

Start-up, Shutdown, Malfunction:

The company maintains a start-up, shutdown, malfunction plan in accordance with 40 CFR Part 63, Subpart AAAA for Municipal Solid Waste Landfills. DM observed the plan and all records implemented as a result of the plan.

Miscellaneous:

There were no odors verified off site.

SUMMARY

The Ottawa County Farms Landfill appears to be in compliance with all applicable requirements. Records are attached.

NAME 

DATE 8/21/14

SUPERVISOR PAB