

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

N524533124

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| FACILITY: MARQUETTE COUNTY SOLID WASTE MANAGEMENT AUTHORITY | | SRN / ID: N5245 |
| LOCATION: 600 COUNTY ROAD NP, MARQUETTE | | DISTRICT: Upper Peninsula |
| CITY: MARQUETTE | | COUNTY: MARQUETTE |
| CONTACT: Brad Austin, Director | | ACTIVITY DATE: 01/13/2016 |
| STAFF: Joe Scanlan | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Unannounced inspection to determine compliance with PTI#'s 310-91L, 930-93, 53-98, 117-10. | | |
| RESOLVED COMPLAINTS: | | |

FACILITY: Marquette County Solid Waste Management Authority (MCSWMA)**INSPECTION DATE:** 1/13/2016**MDEQ-AQD STAFF:** Joseph Scanlan, EQA**FACILITY REPRESENTATIVES:** Brad Austin, Director**LOCATION:**

MCSWMA is located in central Marquette County in Sands Township with access off of County Road 480. The area is largely rural, however there are homes to the north-northwest within a half-mile of the facility's property line.

SOURCE DESCRIPTION

MCSWMA is a Type II municipal solid waste landfill that currently accepts sludge, asbestos containing wastes, fly ash, industrial waste, miscellaneous solids, municipal household waste, household hazardous waste, recyclable materials, and also offers a drug take back program.

Because MCSWMA does not exceed NSPS design capacity threshold they are not required to operate under an ROP which addresses non-methane organic carbon (NMOC) emission rates nor install a gas collection system.

REGULATORY APPLICABILITY:

The stationary source is located in Marquette County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

MCSWMA has been issued four PTI's through AQD for two (2) waste oil furnaces, a thermal soil oxidizer for soil remediation, and a fluorescent bulb crusher. The facility operates a parts washer that uses an aqueous-based solvent which does not require a PTI. MCSWMA has a fugitive dust plan in place and also a leachate recirculation plan, which addresses the leachate evaporators and odor management.

MCSWMA has not reached nor exceeded NSPS design capacity threshold of greater than or equal to 2.5 million megagrams (Mg) or 2.5 million cubic meters (m³) and an NMOC emission rate of greater than or equal to 50 Mg/year. Because of this, the landfill is not considered a Title V facility and is not required to obtain a Renewable Operating Permit (ROP) to address NMOC emissions nor operate a gas collection system. Therefore, this landfill has no wells or flares.

Asbestos waste is accepted at MCSWMA and is regulated under 40 CFR Rule 61, Subparts 154(c) and 154(e) through (j), Standards for Active Waste Disposal Sites. The facility is currently not required to install gas collection; however, in the event wells would be required to be installed all locations of asbestos containing materials taken in at the facility have been recorded on a map of the facility. Review of records of the last 12 months demonstrated that the records are kept in a timely manner. Information relating to generator identification, transporter identification, quality of material, containment, and location of material are all being kept in a compliant manner. TriMedia Environmental & Engineering is the consultant which surveys and provides records for asbestos disposal locations. TriMedia utilizes GPS lat/long recording specific disposal sites and displays these on maps as illustration and numerical data. There are no records of requests to disturb placed waste and no indications of the need to do so.

The landfill operates a leachate collection system with lagoons and two (2) Neptune leachate evaporators which are exempt from a PTI as demonstrated by their potential for emissions [Rule 278(a)]. The leachate evaporators and leachate odor management are addressed in the Leachate Recirculation Plan. It should be noted that no official odor complaints have been received regarding this facility in the last twelve months.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451. All reciprocating internal engines (RICE) are small, non-road engines and therefore not subject to MACT Subpart ZZZZ or NSPS Subparts IIII or JJJJ.

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

INSPECTION

On 1/13/2016 I conducted a scheduled visit to Marquette County Solid Waste Management Authority landfill in central Marquette County. PPE worn during this inspection included steel-toed boots, safety vest, safety glasses and hardhat. I met with Authority Director Mr. Brad Austin in his office, along with the following OWMRP staff: Mrs. Carolyn St. Cyr (U.P. District Engineer), Mr. Phil Roycroft (Cadillac/U.P District Supervisor), and Mr. Michael Marshall (Lansing--scrap tire program).

The portable thermal oxidizer used for soil remediation and permitted under PTI# 310-91L is no longer onsite and Director Austin has no knowledge or history of the unit. It is surmised that this portable facility was needed for a temporary soil remediation project and was removed once it was no longer needed. This permit may be voided at the request of the facility.

The two waste oil furnaces permitted under PTI #'s 930-93 and 53-98 were replaced in 2014 and 2015, respectively. The new units are Clean Burn 5000's which operate at a maximum of 500,000 BTU/hr consuming a maximum of 3.3 GPH of waste oil. Both units have a filtered fuel delivery system and did not exhibit any sign of opacity at the time of inspection (PTI requirements). Because these units burn waste oil that is not generated at the geographical site they are not eligible for a permit exemption under Rule 282(b). Waste oil has most recently been purchased from OSI Environmental from Kaukauna, Wisconsin, in 4000 gallon deliveries. Each purchased delivery from OSI Environmental includes analytical data to prove compliance with the used oil specifications as listed in 40 CFR Part 279.

The fluorescent bulb crusher permitted under PTI# 117-10 is still on-site, however at the time of inspection it was dismantled and in storage. The bulb crusher had not been in use since Director Austin took charge of the facility—longer than 12 months. No records were on file in regards to the total number of bulbs crushed dialer, monthly, or 12-month rolling (PTI requirements). Director Austin assembled the unit and emailed staff with a photograph of the unit after the inspection. MCSWMA does not intend to operate the unit in the near future, however they do not wish to void the PTI or get rid of the unit at this time.

PTI DETAILS

| Description of Emission Unit | PTI# | Installation/ Modification Date | Compliance Status |
|---|---------|------------------------------------|----------------------|
| Portable thermal oxidizer for soil remediation. Unit is no longer on site. | 310-91L | March 1995 | NA |
| Originally issued for a Clean Burn waste oil heater (model CB-90-D), the unit was replaced in 2014 with a Clean Burn 5000 (model CB-5000) Unit is located in the main tipping/baler building. | 930-93 | January 1994 | C |
| Originally issued for a Inov8 waste oil heater (model F200), the unit was replaced in 2015 with a Clean Burn 5000 (model CB-5000). Unit is located in the maintenance shop. | 53-98 | February 1998 | C |
| Sealed fluorescent lightbulb crusher consisting of a bulb crusher, a | | | |

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| Minuteman MRS 1 vacuum w/HEPA filter for particulates and activated carbon canister for mercury removal, and Lumex mercury spectrometer to detect leaks. | 117-10 | July 2010 | C |
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SUMMARY

310-91L, 930-93, 53-98, or 117-10 were observed at the time of this inspection and the facility appears to be in compliance with the permits as well as the asbestos NESHAP.



Image 1(M1) : Fluorescent bulb crusher w/HEAP vacuum PTI# 117-10



Image 2(M2) : Clean Burn 5000 waste oil heater PTI#s 930-93 & 53-98



Image 3(M3) : Neptune leachate evaporator in use.

NAME Joseph Seaman

DATE 4/12/16

SUPERVISOR Dan W. Meli