

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

N539738391

FACILITY: Peoples Landfill, Inc.		SRN / ID: N5397
LOCATION: 4143 E. Rathbun Rd., BIRCH RUN		DISTRICT: Saginaw Bay
CITY: BIRCH RUN		COUNTY: SAGINAW
CONTACT: Lori Winters , People's Site Engineer		ACTIVITY DATE: 01/17/2017
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Compliance inspection of MI-ROP-N5397-2014.		
RESOLVED COMPLAINTS:		

I (glm) conducted an announced site inspection at the People's Landfill (N5397). The purpose of the site inspection was to determine compliance with the facility's Renewable Operating Permit (MI-ROP-N5397-2014) and air quality regulations.

Facility Description

People's Landfill is a municipal solid waste (MSW) landfill in Birch Run owned and operated by Waste Management. The facility is located in Saginaw County in Birch Run and began accepting waste in 1969. People's Landfill has design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) of non-methane organic compounds. The landfill was modified since May 30, 1991. This stationary source includes a Type II sanitary landfill, active municipal solid waste landfill (MSW) with an active landfill gas collection system, and a gas-to-energy facility (owned and operated by North American Natural Resources-People's Generating Station) both of which are operated year round. Solid waste arrives in a variety of vehicles that potentially generate fugitive dust emissions. The primary standard industrial code is 4953 (Municipal Solid Waste Landfill).

Waste Management (WM) and NANR-People's Generating Station have a contractual agreement in which People's Landfill sells landfill gas (LFG) to NANR and NANR is dependent upon People's Landfill to provide landfill gas which is combusted in its five internal combustion engines. The contractual and spatial relationship of the two facilities establishes People's Landfill and NANR-People's Generating Station as a single stationary source based on the definition in Michigan's Rule 336.1119(r). However, based on an agreement between the AQD and management of People's Landfill and NANR-People's Generating Station, the two facilities were issued separate State Registration Numbers (SRNs) and ROPs in 2013 and 2014 respectively.

Compliance Determination

I met with Ms. Lori Winters Site Engineer, Mr. John Davis, P.E., new site engineer and Mr. Ben Rodriguez, gas well technician to discuss the facility and review testing/sampling and recordkeeping requirements. To determine compliance the following emission units were evaluated with respect to conditions specified in MI-ROP-M5397-2014. Ms. Winters is retiring and Mr. Davis will be the new contact for the site.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID

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EULANDFILL	This emission unit represents the general Municipal Solid Waste (MSW) Landfill.	1-1-68	NA
EUOPENFLARE	Open flare is an open combustor without enclosure or shroud.	3-29-04	NA
EUACTIVECOLL	This emission unit represents the active landfill gas collection system at the landfill that uses gas mover equipment to draw landfill gas from the wells and moves the gas to the control equipment.	6-6-95	NA
EUASBESTOS	Any active or inactive asbestos disposal site.	1-1-68	NA
EUCOLDCLEANERS	New cold cleaners exempt from the requirements of R 336.1201.	11-01	FGCOLDCLEANERS

EULANDFILL

As I approached the landfill from the North on Petit Rd. then from the West on Rathbun Road, no odor was present. Temperature was approximately 34 degrees Fahrenheit and wind was from the N/NE at approximately 10 mph.

The landfill is subject to the NSPS WWW requirements applicable to a landfill with NMOC emission rate greater than 50 megagrams per year and a maximum design capacity greater than 2.5 cubic meters. The MAERS 2015 reported emissions from the landfill were 15.26 tons. The landfill gas from the gas collection and control system (GCCS) is sent to the adjacent gas to energy plant owned and operated by NANR (P0415) or an enclosed flare.

I reviewed surface methane scan records from 2015 thru 2016. People's contracted Air Quality Specialist Inc. (AQSI) in 2015 and Monitoring Control and Compliance, Inc. (MCC) in 2016 to perform the surface emissions monitoring (SEM). The contracted technicians performs calibration checks prior to sampling and performs sampling in a traversing pattern as required per the ROP. The adopted standard operating procedures for an exceedance has been to add additional cover to the area, re-monitor that area the same day and count as the 10-day re-monitoring event. If the exceedance is not confirmed, i.e. the 10-day sampling event is more than 500 ppm, the 1-month sampling is then performed. The facility has occasional exceedances during the quarterly monitoring. Re-monitoring was performed and all locations were cleared of their exceedances.

The facility accepted 539,129 cubic yards of waste in 2015 and 614,153 cubic yards in 2016. Current waste in place was 14,058,470 cubic yards.

EUOPENFLARE

The flare is designed to control up to 2,000 scfm. The flare operates mainly as a backup to the NANR gas to energy facility. During my inspection the flame was not operating as the landfill gas (LFG) was being utilized at the NANR gas to energy facility.

Per 40 CFR 60.756 (c) monitoring operation is as follows. The flare has two thermocouples to monitor for the continuous presence of a flame. One flame at the pilot and the other up higher, towards the middle of the flame. If the presence of flame cannot be detected the flare automatically shuts down. People's landfill does not have a bypass of the control system. Therefore, landfill gas does not get discharged to ambient air. The facility has installed a measuring device that records temperature and the flow to the control device every 10 minutes.

The most recent stack test was conducted in June 2010. The average inlet flow to the flare was 1,460 scfm and average stack gas exit velocity was 70.0 fps. The 40 CFR 60.18(c) (4) (iii) maximum permitted velocity calculated is 105.3 fps. The average net heating value of the gas being combusted was 18.96 MJ/sec. Per 40 CFR 60.18 (c) (3) (ii), the net heating value must be > 7.45 MJ/sec.

The facility reported a throughput of 6.839 MMCF for the flare during the 2015 reporting period.

I reviewed flare data for November 2016. The flare operated on 11/07/2016 from approximately 9:50 thru 12/13/2016 at 14:00. Data was appropriate with regards to stack test data and the standard.

EUACTIVECOLL

I reviewed gas well data from December 2015 and 2016, see attached. During this time period the collection system operated with negative pressure at each well head and is in compliance with the requirements of the NSPS subpart WWW and the ROP requirements.

Field calibrations are performed before each sampling event and the sampling device is also sent to the manufacturer a couple of times a year for calibration.

EUASBESTOS

I reviewed the last 10 asbestos records and asbestos placement tracking received by the facility. The facility maintains a map and database that includes the asbestos generator, volume, and placement coordinates within the landfill. All required information was recorded, see attached records.

EUCOLDCLEANERS

The facility contract Safety Kleen to dispose of the solvent. The solvent is removed as needed, typically once per year. Documentation of solvent usage is maintained by Safety Kleen.

At the time of my inspection the facility was in compliance with the requirements of its ROP number MI-ROP-N5397-2008.

NAME Mike R. McCann DATE 2/1/17 SUPERVISOR C. Stone