

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

N601130563

FACILITY: MUSKEGON COUNTY SOLID WASTE FACILITY		SRN / ID: N6011
LOCATION: 9366 APPLE AVE, RAVENNA		DISTRICT: Grand Rapids
CITY: RAVENNA		COUNTY: MUSKEGON
CONTACT: Greg Leverage , Solid Waste Manager		ACTIVITY DATE: 08/06/2015
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 10:30 A.M. on August 6, 2015, Air Quality Division staff Dave Morgan and Kaitlyn DeVries conducted a scheduled inspection of the Muskegon County Solid Waste Facility (MCSWF) located at 9633 Apple Avenue in Ravenna. The purpose of the inspection was to determine the facility's compliance with Renewable Operating Permit (ROP) No. MI-ROP-N6011-2013 and state and federal air pollution regulations. Accompanying AQD staff on the inspection was Greg Leverage, Solid Waste Supervisor.

#### FACILITY DESCRIPTION

The MCSWF is a municipal solid waste landfill located in Ravenna, which began operation in 1973 and has a maximum design capacity of 3.76 million megagrams. MCSWF currently has one closed waste cell (Cell 1), one cell at final grade (Cell 2), two active waste cells (Cells 3&4) and one future waste cell (Cell 5). Gases from Cells 1-3 are collected through an active collection system and then controlled through an open flare or treated and sent off-site for combustion.

Because the solid waste facility began accepting waste prior to May 30, 1991 and has not subsequently received an increase in their permitted design capacity, the landfill is an existing source subject to the Federal Plan requirements under 40 CFR Part 62, Subpart GGG used to implement emission guideline requirements under 40 CFR Part 60, Subpart Cc. Current and relevant applicable requirements in the Federal Plan reference those requirements contained in 40 CFR Part 60, Subpart WWW (the NSPS for new landfills constructed after May 20, 1991).

In addition, the solid waste disposal facility is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) from Municipal Solid Waste Facilities, promulgated under 40 CFR Part 63, Subpart AAAA, because the facility has a design capacity greater than 2.5 million cubic meters and NMOC emissions calculations exceed 50 Mg/yr. It is noted that all Federal Plan, NSPS and NESHAP requirements have been directly incorporated into ROP No. MI-ROP-N6011-2013.

#### COMPLIANCE EVALUATION

##### [EULANDFILL]

Records pertaining to maximum design capacity and year-by-year waste acceptance rates are maintained on site in accordance with ROP requirements. According to Mr. Leverage a survey of the amount of waste in place is conducted annually at the end of the fiscal year (in September). As of October 2014 there are approximately 3,410,850 cubic yards of waste in place with a total permitted air space of 4,684,900 cubic yards. In addition, a startup, shutdown, malfunction plan is implemented in accordance with 40 CFR Subpart 63, Subpart AAAA.

The County implements a program to monitor the cover integrity on a monthly basis and records the information.

Cover integrity is verified on a regular basis and documented during the monthly well monitoring event. Cover issues are documented and addressed appropriately.

##### Surface Monitoring:

The County is monitoring surface methane concentration on a quarterly basis in accordance with the ROP. All records of surface monitoring include the sampling date, sampling location, and occurrence/location of any exceedances. These records are being maintained in accordance with the ROP. Calibration of the TVA 1000-TE flame ionization device (FID) appears to be conducted in accordance with EPA Method 21 and records are maintained appropriately. The ROP requires that the collection system be operated so that the methane concentration is less than 500 ppm above background at the surface of the landfill and that the surface methane is monitored on a quarterly basis. If a reading above 500 ppm exists, corrective actions and re-monitoring is required with 10 days of the exceedance. A violation exists if any reading above 500 parts per million (ppm) is detected three times within a quarterly period.

County records were reviewed for the 3rd and 4th Quarters of 2014 and the 1st and 2nd Quarters of 2015. No surface monitoring exceedances above 500 ppm were recorded.

#### [EUALGCS]

##### Active Landfill Gas Collection System:

Because the company calculated non-methane organic compound (NMOC) emissions above 50 Mg/year, the County was required and has installed a landfill gas collection and control system in accordance with the ROP.

All collection wells are placed with sufficient density to control surface gas emissions as certified by a professional engineer. All wells are constructed of schedule-80 PVC pipe with HDPE well heads.

The ROP requires that each interior wellhead be operated with a landfill gas temperature less than 131°F, an O<sub>2</sub> level less than 5%, and negative pressure. The County is monitoring static pressure, oxygen (O<sub>2</sub>) concentration, and temperature on a monthly basis in accordance with the ROP using an Elkins Envision gas meter. All wells are equipped with required sampling ports.

From July 2014 through July 2015 records showed that there were two instances where the monitored O<sub>2</sub> was greater than 5% in wells EW03 and EW36. These exceedances were documented and valves adjusted. Re-monitoring showed O<sub>2</sub> values returned to less than 5%. There were no temperature or pressure exceedances.

It is noted that the County reported a deviation for missing the March 2015 monitoring event. Essentially the County was to conduct well monitoring on March 31, 2015 but missed the monitoring that day in part to problems with the Landtec GEM gas monitor. Sampling was conducted on April 1, 2015 with no well parameter exceedances. Monitoring for the April 2015 monitoring event was conducted on April 28, 2015 with no monitored exceedances. Therefore two monitoring events occurred in April, 28 days apart. At a minimum this should be reported as a deviation during the annual and semi-annual ROP compliance certification.

It is noted that well OC-1 and OC-2 were installed on leachate collection points to address odors from the site. However, based on EPA determinations, these wells are required to be monitored in accordance with NSPS requirements.

#### [EUTREATMENTSYSTEM]

A landfill gas treatment and compressor system is installed to allow landfill gas to be burned in off-site combustion units (at Eagle Alloy and Sun Chemical). In the process, landfill gas captured from the field is sent into the compressor station. The gas passes through a knockout tank that contains a demister pad to remove any condensed liquid and then through a filter section to remove particulates.

The filtered gas then goes through an electric compressor to compress the gas to 20 psig which will result in an outlet temperature of 200°F. The gas is then cooled to 100°F through an air-to-air heat exchanger. Following the cooler, liquids are removed by a moisture separator (cyclone) to remove any free liquid. The gas is dried to a dew point of 40°F using a refrigeration dryer and the temperature of the gas cooled to 40°F by a refrigeration system using R22 gas. Treated gas is metered, analyzed, and transported to the end user(s) via the pipeline. All operating conditions including gas flow, temperatures, and pressures are monitored using a computer monitoring system. At the time of the inspection, all gas was going through the treatment system and no gas was going to the flare.

The County has an acceptable preventative maintenance plan on site. In accordance with that plan, County personnel conduct daily inspections of the treatment system components and document any maintenance activities performed or equipment notes. Preventative maintenance records were reviewed on site.

#### [EUOPENFLARE] :

The County also operates a 600 scfm non-assisted, open flare to burn landfill gas generated by the landfill. At the time of the inspection, no gas was going to the flare. There is no bypass line on the flare, but all gas burned in the flare has gone through the treatment system.

The flare is equipped with an ultraviolet sensor that continuously monitors flame presence. In addition, the company installed a pilot flame system fueled by a propane tank in which the temperature is also monitored. Upon flare outage, the flame controller shuts down the blower and main well field valve until the flame is relighted. Re-ignition of the flare is conducted automatically; however, it can be done manually. The flame outage procedure is also dependent on whether gas is diverted to the other users. The company is recording the presence of flame by monitoring the temperature of the flame when the flare is operating and the temperature of the pilot flame.

Adding the pilot flame allowed the County to divert all gas to the treatment system rather than diverting a small amount of gas to the flare just to keep a flame presence.

The initial performance test for the flare was conducted on July 1, 2004.

All flare outages are being recorded in accordance with the ROP and SSM plan.

Startup/Shutdown/Malfunction:

A startup, shutdown, malfunction (SSM) plan is maintained and implemented at the site. All SSM reports are kept on file at the site. Outages of both the treatment system and the flare are reported as "GCCS" in the SSM Records. There were a few outages where the entire system was down these were mainly due to maintenance activities. Essentially the blower was shutdown and no gas was extracted. All SSM events are documented including the startup of new extraction wells.

All semi-annual SSM reports are submitted in accordance with ROP schedules.

[EUASBESTOS]:

The County does not accept asbestos containing material.

SUMMARY

The Muskegon County Solid Waste Facility is in compliance with all applicable requirements. All records are being maintained in accordance with the ROP.

NAME

DATE

SUPERVISOR

