

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

N603451765

FACILITY: WOOD ISLAND WASTE MANAGEMENT		SRN / ID: N6034
LOCATION: EAST 10081 STATE HIGHWAY M-28 EAST, WETMORE		DISTRICT: Upper Peninsula
CITY: WETMORE		COUNTY: ALGER
CONTACT: Joe Prunick , Operator/Manager (also RO 9/24/19)		ACTIVITY DATE: 12/17/2019
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced inspection to determine compliance with MI-ROP-N6034-2018 and ACO 2018-14.		
RESOLVED COMPLAINTS:		

Contact: Mr. Joe Prunick, Landfill Operator and Responsible Official

This is a scheduled inspection for this facility to determine compliance with MI-ROP-N6034-2018 and Administrative Consent Order (ACO) Number 2018-14. It is the first inspection since the facility's initial ROP was issued in September of 2018.

Wood Island Waste Management Sanitary Landfill (Wood Island) is located on State Highway M-28 nearest the community of Wetmore, Alger County, approximately 3.2 miles southeast of the City of Munising and 3.5 miles south of Pictured Rocks National Lakeshore southern boundary. There is a campground, a hotel, and a handful of small commercial businesses directly to the north on M-28 and a log home manufacturer directly to the west, sharing a property line with the landfill. The area with the highest concentration of residential dwellings is located one mile directly to the west of the landfill in Wetmore.

Wood Island is a Type II Municipal Solid Waste (MSW) landfill that has been actively accepting waste since 1992. The landfill accepts sludge, asbestos containing material (ACM) waste, fly ash, industrial waste, miscellaneous solids and municipal household waste.

The facility was permit-exempt until expansion in 2016 when it became subject to 40 CFR Part 60 Subparts A and XXX (landfill expansion exceeded design capacity greater than 2.5 million megagrams/2.5 million cubic meters with NMOC emissions of less than 34 megagrams per year). Wood Island was issued its initial ROP on September 4, 2018. The facility has historically accepted ACM waste and prior to being issued the ROP the facility was regulated under 40 CFR Part 61 Subpart M (Asbestos NESHAP) and routinely inspected by district staff. Last inspection was March 14, 2018, as district staff was preparing the initial ROP.

Wood Island has three emission units:

- **EU-LANDFILL<34:** A Type II MSW landfill consisting of 12 cells; active since 1992. Cells 1-10 were closed in 2018 and utilize a passive Gas Collection Control System (GCCS) with 20 vents. Cell 11 is currently active and has not had a GCCS installed at this time, however it is planned to install a passive GCCS within the next few months (sometime in 2020). Construction has been completed on cell 12, however this cell will not be actively accepting waste for approximately another year. A passive GCCS will be installed in Cell 12 prior to accepting waste;
- **EU-ASBESTOS:** Because the facility accepts asbestos containing material as waste it is regulated under CFR 40 Part 61 Subpart M;
- **EU-WOOD BOILER:** Central Boiler (Model CL 6048) 1.25 MMBtu/hr biomass fired boiler for seasonal space heating in the shop during the winter months and is regulated under 40 CFR Part 63 Subpart JJJJJ. This emission unit does not utilize air pollution control devices and vents directly to the atmosphere via a single stack

INSPECTION

On 12/17/2019 I arrived at the facility and contacted Landfill Operator Mr. Joe Prunick inside the maintenance garage attached to the main office. Mr. Prunick and I went over the ROP and the regulatory requirements in his office.

EU-LANDFILL<34

I & II – There are no Emission (I) or Material Limits (II) for this emission unit.

III – Process/Operational Restriction special condition (SC) III.1 requires the facility to annually calculate the NMOC emission rate.

IV – There are no Design/Equipment Parameter(s) special conditions for this emission unit.

V – Testing/Sampling SC V.1 requires testing for NMOC. Initial NMOC emission rate was calculated using Tier 2 procedures (SC V.1.b). Sampling was conducted April 5, 2017 and results submitted with the ROP application. Resulting concentration of NMOC was 76 ppmv as hexane. Using this result and LandGEM modeling software, NMOC generation for 2018 was estimated to be 3.55 Mg (as submitted with 2018 MAERS); NSPS Subpart XXX threshold is 34 Mg/year. Because the landfill is below the threshold of 34 Mg/year it is not required to install an active gas collection system. LandGEM NMOC emission modeling shows the facility will not exceed 4.0 Mg/year until 2022. The facility complies with Subpart XXX and under Tier 2 will be required to test again no later than April of 2022.

VI – Monitoring/Recordkeeping SC VI.1 requires the facility to keep records of the amount of solid waste currently in place and the year-by-year acceptance rate. The facility has accepted 56,530 tons of waste in Cell 11 during 2019 (average of 223.44 tons/day) and has accepted a total volume of 142,744 tons of waste since Cell 11 opened.

VII – Reporting SC VII.1, VII.2 and VII.4 requirements to report deviations semiannually and NMOC emission rates have been met as the facility submitted these to the district September 19, 2019. The facility has not yet been required to submit an annual deviation report (SC VII.3). SC VII.6 through VII.12 are not applicable currently. The facility has been on-time with reporting and reported one deviation relating to the tune-up of EU-WOOD BOILER (see below).

VIII – Stack/Vent Restriction(s) are not applicable.

IX – Other Requirement(s) SC IX.1 is not applicable currently. The facility is in compliance with SC IX.2 (40 CFR Part 63 Subpart AAAA) and IX.3 (40 CFR Part 60, Subparts A and XXX).

EU-ASBESTOS

The facility entered a Consent Order (ACO 2018-14) with EGLE on 10/25/2018 for multiple violations of the Asbestos NESHAP. At the time of inspection, the facility was in full compliance with the Asbestos NESHAP requirements specified in EU-ASBESTOS of MI-ROP-N6034-2018 and the conditions within ACO 2018-14. Warning signs are displayed adequately near the disposal area and all waste manifests and records of ACM waste deposits (location, depth, quantity) were readily available and well-kept. In addition to adequate record-keeping on file, the facility now has a paper map that is updated by hand with each new load of ACM waste with X, Y, and Z coordinates for visual reference. The map is updated frequently by a third party where all new coordinates are accurately placed on the map. The facility has done an excellent job of being in maintaining compliance in regard to ACO 2018-14 and MI-ROP-N6034-2018.

EU-WOOD BOILER

This emission unit is a Central Boiler, Model CL6048, and is a wood-fired boiler and is classified as a 'seasonal biomass' heat source, generating a maximum heat input of 1.25 MMBtu/hr.

The facility filed a single deviation in their semi-annual report regarding a missed required initial performance tune-up for EU-WOOD BOILER and the required additional notification of compliance, due March 21, 2014 and March 1 every 5 years thereafter (e.g. March 1, 2019) per 40 CFR Part 63, Subpart JJJJJ. The facility was unaware of the requirements of Subpart JJJJJ until submitting for their ROP application. Corrective action was taken, and the performance tune-up was completed 12/02/2019 by Snowbelt Stoves where the stack was cleaned, fluid level checked, the inside of unit was inspected and cleaned, and all wires/power supply was inspected. The facility is now in compliance with the tune-up requirements for Subpart JJJJJ.

Additionally, the facility is required to document seasonal use of the wood boiler and that the unit is shut down for 7 continuous months each calendar year. The boiler shut down typically shuts down in mid-April and re-commences operation in late November or early December. For 2019 the unit shut down April 15 and began operation on December 2, within the allowable time-frame for use.

The facility is also required to maintain a log detailing malfunctions and corrective actions. No malfunctions or corrective actions have occurred since initial start-up.

CONCLUSION

The facility is in compliance with MI-ROP-N6034-2018 and ACO 2018-14. I observed no violations of the Michigan Air Pollution Control Rules.

NAME Joseph S. [Signature]

DATE 12/23/19

SUPERVISOR [Signature]