

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

N603733125

FACILITY: MICHIGAN ENVIRONS INC		SRN / ID: N6037
LOCATION: 6111 W ELMWOOD RD, MENOMINEE		DISTRICT: Upper Peninsula
CITY: MENOMINEE		COUNTY: MENOMINEE
CONTACT: ROBERT J PLISKA , REGIONAL ENGINEER		ACTIVITY DATE: 01/27/2016
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced inspection to determine compliance with MI-ROP-N6037-2011.		
RESOLVED COMPLAINTS:		

FACILITY: Michigan Environs Inc (MI-ROP-N6037-2011)

INSPECTION DATE: 1/27/2016

MDEQ-AQD STAFF:

- Joseph Scanlan, EQA

FACILITY REPRESENTATIVE:

- Bob Pliska, Landfill Engineer, Waste Management

LOCATION:

Michigan Environs is located in Menominee County, approximately 4.5 miles north of the City of Menominee. The surrounding area is largely rural, however there are several residences within 0.25 miles of the closed and active portions of the landfill. The active portion of the landfill is north of Elmwood Road, while the closed portion of the landfill is on the south side of Elmwood Road. There are single-family homes in between the two along Elmwood Road.

SUMMARY OF OPERATIONS:

Michigan Environs is a Type II municipal solid waste landfill that currently accepts sludge, asbestos containing waste, fly ash, industrial waste, and miscellaneous solids, along with municipal household waste. The facility is owned and operated by Waste Management (WM).

The landfill operates a small parts washer, a passive gas collection system, leachate storage tank and leachate collection system. It should be noted that no official odor complaints have been taken regarding this facility in the last twelve months.

It should also be noted that the majority of ROP permit conditions associated with this facility only apply once the facility has reached a non-methane organic carbon (NMOC) emissions threshold of 50 Megagrams per year based on testing and modelling through the LandGem program. As per their last testing performed in 2015, the facility has not exceeded that threshold. Therefore, only applicable permit conditions of MI-ROP-N6037-2011 are addressed in this station activity report.

REGULATORY APPLICABILITY:

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

Because Michigan Environs (EULANDFILL) exceeds NSPS design capacity limits they are required to operate under an ROP which addresses non-methane organic carbon (NMOC) emission rates, asbestos-containing waste (EUASBESTOS), leachate storage tank, and fugitive dust plan. 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.

Landfill gas from the facility is collected through a passive gas collection system consisting of 26 vents and 19 passive flares. The vent wells rely on positive pressure created by the facility to move the gas rather than through the use of mechanical equipment. The landfill gas migrates up through the wells and is then released into the atmosphere or is combusted via flaring. This system is allowed to be operated until 30 months after the facility's actual NMOC emission reach 50 Mg. Based on most recent Tier 2 testing completed May of 2015, current facility NMOC emissions are 1.38 Mg/year.

Asbestos waste (EUASBESTOS) is accepted at Michigan Environs Inc and is regulated under 40 CFR Rule 61, Subpart 154(c) and 154(e) through (j), *Standards for Active Waste Disposal Sites*.

MI-ROP-N6037-2011 contains one flexible group (FGCOLDCLEANERS) which covers existing and future exempt cold cleaners, regulated by Act 451, Rule 611/707. This former emission unit has been dismantled and removed from the site and replaced with a parts washer that uses an aqueous-based solvent manufactured by Safety Kleen. Flexible group FGCOLDCLEANERS will be removed from the ROP in the upcoming ROP renewal process in 2016.

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.

This facility is currently in the process of renewing their ROP. The only notable change is the removal of FGCOLDCLEANERS.

INSPECTION

PPE worn during facility visits included steel-toed boots, safety vest, safety glasses and hardhat.

On 1/27/2016 I conducted an unscheduled visit of Michigan Environs Inc. No odors were noted downwind and outside the facility. All haul roads, the plant yard, and the active parts of the landfill had no noticeable visible emissions during the inspection and appeared to be in good repair. Unfortunately, there was no landfill operator at the facility when I entered the main offices adjacent to the closed portion of the landfill on the south side of Elmwood Road. Mr. Kurt Kietzer is Waste Management's District Manager for the facility, however he is only at the facility part-time and was not there at the time of my inspection. I had a brief conversation with Mr. Chris Daley, District Ops Manager, about any major changes which may affect the ROP. Mr. Daley verified that the cold-cleaner parts washer had been removed and replaced with a parts cleaner that used an aqueous-based solvent. Mr. Daley also stated that to his knowledge there were no major changes in the operation of the landfill or additional equipment acquired. The secretary at the main office had no knowledge of where any records were kept. I then drove to the scale house across Elmwood Road at the active portion of the landfill and had a brief conversation with Ms. Heidi Renee, who stated that she did know where the asbestos records were located in the main office, however I stated that I would request the information from Mr. Pliska.

On 3/03/2016 I received adequate records for leachate handling and transportation as well as the asbestos waste handling records and disposal locations.

EMISSION UNIT DETAILS

Emission Unit ID	Description of Emission Unit	ROP/PTI#	Installation/Modification Date	Compliance Status
EULANDFILL	This emission unit is of a landfill which has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters, but actual emissions based upon an established Tier 2 value in the landfill calculation are less than 50 megagrams. This landfill also has received a volume expansion permit to increase design capacity from the DEQ after May 30, 1991, and therefore making the landfill subject to NSPS WWW.	MI-ROP-N6037-2011	1/01/1995 / NA	C
EUASBESTOS	The landfill is actively or has accepted asbestos waste in the past.	MI-ROP-N6037-2011	1/01/1995 / NA	C

EULANDFILL

TESTING/SAMPLING – Tier 2 testing to demonstrate the NMOC annual emissions rate was performed in 2015 and demonstrated that the facility was below the 50 Mg threshold for NMOC annual emissions (1.38 Mg/year).

MONITORING/RECORDKEEPING – 5 year record retention on-site of design capacity report, current amount of solid waste in-place, and year-by-year waste acceptance rate were provided upon request via email after the inspection.

REPORTING – All required ROP reporting has been submitted in a complete and timely manner.

EUASBESTOS

PROCESS/OPERATIONAL RESTRICTION(S) – The entire facility was adequately fenced and properly signed to deter the general public. Asbestos containing material is logged in, surveyed for latitude, longitude, and elevation, and buried properly.

DESIGN/EQUIPMENT PARAMETER(S) - The facility has a passive gas collection system in the closed portion of the landfill. In the event that areas within the closed portion of the landfill needed to be disturbed all locations of asbestos containing materials taken in at the facility have been recorded on a map of the facility.

MONITORING/RECORDKEEPING – 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.

Construction Quality Management, Inc. (CQM) based out of Green Bay is the consultant which surveys and provides records for asbestos disposal locations. CQM utilizes GPS lat/long recording specific disposal sites and displays these on a map as illustration and numerical data.

REPORTING – Semi-Annual and Annual Reporting is being performed in a timely manner. There are no records of requests to disturb placed waste and no indications of the need to do so.

SUMMARY

No violations of ROP #MI-ROP-N6037-2011 were observed at the time of this inspection and the facility appears to be in compliance with the ROP, Michigan Air Pollution Control Rules and asbestos NESHA.



Image 1(ME1): Safety Kleen parts washer using aqueous-based solvent which replaced the small parts washer utilizing halogenated solvents.

NAME Joseph Scandura

DATE 3/3/16

SUPERVISOR Don W. Mahi

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

N603733525

FACILITY: MICHIGAN ENVIRONS INC		SRN / ID: N6037
LOCATION: 6111 W ELMWOOD RD, MENOMINEE		DISTRICT: Upper Peninsula
CITY: MENOMINEE		COUNTY: MENOMINEE
CONTACT: ROBERT J PLISKA, REGIONAL ENGINEER		ACTIVITY DATE: 01/27/2016
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

ASBESTOS INSPECTION DATE: 1/27/2016**DEQ-ASBESTOS NESHAP STAFF:** Joseph Scanlan**FACILITY:** Michigan Environs Inc.**FACILITY OWNER:** Waste Management**LOCATION:** 6111 West Elmwood Road, Menominee, Menominee County**DESCRIPTION:** Asbestos waste (EUASBESTOS) is accepted at Michigan Environs Inc. and is regulated under 40 CFR Rule 61, Subparts 154(c) and 154(e) through (j), *Standards for Active Waste Disposal Sites*.**INSPECTION:** During my inspection there was no landfill operator on site at the facility. I contacted Mr. Bob Pliska of Waste Management to provide records and explain the the process in which the landfill accepts asbestos containing material (ACM). A 24-hour notice is required prior to the ACM entering the property, which allows the landfill to prepare a suitable site for the ACM. The cell location is marked and a surveyor (Construction Quality Management, Inc.) is notified to record the location. Burial locations are recorded on a site map to show where deposited ACM is located within each cell. Waste manifest records are also required prior to accepting ACM waste by contractors, however a small minority of ACM is brought in by the general public.

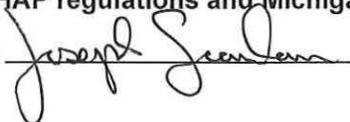
Below are the permit requirements as issued under MI-ROP-N6037-2011 for EUASBESTOS:

PROCESS/OPERATIONAL RESTRICTION(S) – The entire facility was adequately fenced and properly signed to deter the general public. Asbestos containing material is logged in, surveyed for latitude, longitude, and elevation, and buried properly.**DESIGN/EQUIPMENT PARAMETER(S)** - The facility is currently not required to install gas collection. However, in the event that they were, all locations of asbestos containing materials taken in at the facility have been recorded on a map of the facility.**MONITORING/RECORDKEEPING** – Review of records of the last 12 months demonstrated that the records are kept in a timely and adequate manner. Information relating to generator identification, transporter identification, quality of material, containment, and location of material are all being kept in a compliant manner.

Construction Quality Management, Inc. (CQM) based out of Green Bay is the consultant which surveys and provides records for asbestos disposal locations. CQM utilizes GPS lat/long recording specific disposal sites and displays these on a map as illustration and numerical data.

REPORTING – Semi-Annual and Annual Reporting is being performed in a timely manner. There are no records of requests to disturb placed waste and no indications of the need to do so.**SUMMARY:** I observed no violations during my inspection. This facility is in compliance with the asbestos NESHAP regulations and Michigan Air Pollution Control Rules.

NAME



DATE

3/3/16

SUPERVISOR
