

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N603931014

FACILITY: K & W LANDFILL INC		SRN / ID: N6039
LOCATION: 11877 HIGHWAY M-38, ONTONAGON		DISTRICT: Upper Peninsula
CITY: ONTONAGON		COUNTY: ONTONAGON
CONTACT: Shawn Taisto , Site Manager		ACTIVITY DATE: 08/19/2015
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	
SUBJECT: Unannounced inspection of Title V source to determine ROP compliance		SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:		

FACILITY: K&W Landfill Inc (MI-ROP-N6039-2012)

INSPECTION DATE: 8/19/2015

MDEQ-AQD STAFF:

- Joseph Scanlan, EQA

FACILITY REPRESENTATIVE:

- Shawn Taisto, Landfill Operations Manager, Waste Management

LOCATION:

K&W Landfill (K&W) is located in Ontonagon County, approximately 1 mile west of the unincorporated village of Greenland. The surrounding area is rural.

SUMMARY OF OPERATIONS:

K&W is a Type II municipal solid waste landfill that has been accepting municipal and asbestos waste since 1988 and is owned and operated by Waste Management (WM). The landfill also operates a small parts washer and a leachate storage tank. This landfill does not operate a landfill gas collection system, however there is a leachate collection system in place. 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 2010, the facility has not exceeded that threshold. Therefore, only applicable permit conditions of MI-ROP-N6039-2012 are addressed in this report.

REGULATORY APPLICABILITY:

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

Because K&W (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), a small parts washer (FGCOLDCLEANERS), 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.

EULANDFILL has received a volume expansion permit for increased design capacity from the DEQ since May 30, 1991 therefore making the landfill subject to NSPS WWW. Any municipal solid waste landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters is subject to the requirements of Rule 336.1210 to obtain and only operate in compliance with an ROP. R336.1212 Subpart (3)(f) exempts landfills, associated flares, and leachate collection and handling equipment from inclusion into the ROP with exception of applicable requirements under 40 CFR Part 60, Subparts Cc and WWW—which require the source to calculate an NMOC emission rate for the landfill. Due to NMOC emission rates of less than 50 Mg/year, K&W is not required to implement a landfill gas collection/control system.

Asbestos waste (EUASBESTOS) is accepted at K&W and is regulated under 40 CFR Rule 61, Subparts 154(c) and 154(f) through (j), *Standards for Active Waste Disposal Sites*.

MI-ROP-N6039-2012 contains one flexible group (FGCOLDCLEANERS) which covers existing and future exempt cold cleaners, regulated by Act 451, Rule 611/707. The small cold cleaner parts washer has been retired and a new parts washer utilizing an aqueous-based solvent has been installed. This former emission unit has been dismantled and placed in a locked enclosure and is to be removed from the site. It is expected that 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.

INSPECTION

On 8/19/2015 I conducted an unscheduled visit of K&W. PPE worn during this inspection included steel-toed boots, safety vest, safety glasses and hardhat. No odors were noted downwind and outside of 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.

Mr. Taisto escorted me into the maintenance garage where I observed the retired parts cleaner in a locked enclosure and the new parts cleaner which uses the aqueous-based solvent. From there we proceeded to his office upstairs where he provided copies of the asbestos waste handling records and disposal locations. Waste manifests for all other municipal waste, etc., were accessed using Waste Management's internal database.

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-N6039-2012	1984 / 2-12-2004	C
EUASBESTOS	The landfill is actively or has accepted asbestos waste in the past.	MI-ROP-N6039-2012	1984	C

EULANDFILL

I. EMISSION LIMIT(S) – NA

II. MATERIAL LIMIT(S) – NA

III. PROCESS/OPERATIONAL RESTRICTION(S) – NA

IV. DESIGN/EQUIPMENT PARAMETER(S) – NA (Landfill < 50 Mg/year)

V. TESTING/SAMPLING – Tier 2 testing to demonstrate the NMOC annual emissions rate was performed in 2009 and demonstrated that the facility was below the 50 Mg threshold for NMOC annual emissions (2.19 Mg). Current modelling indicates that NMOC emissions in 2034 would be 34 Mg/yr, still below thresholds prescribed in 40 CFR 60 WWW.

VI. 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 all provided upon request.

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

EUASBESTOS

I. EMISSION LIMIT(S) – NA

II. MATERIAL LIMIT(S) – NA

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

IV. DESIGN/EQUIPMENT PARAMETER(S) - The facility is currently not required to install gas collection. However, in tl event that they were, all locations of asbestos containing materials taken in at the facility have been recorded on a ma of the facility.

V. TESTING/SAMPLING – NA

VI. MONITORING/RECORDKEEPING – Review or 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.

VII. 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.

VIII. STACK RESTRICTIONS – NA

IX. OTHER REQUIREMENTS—NA

EXEMPT SOURCES

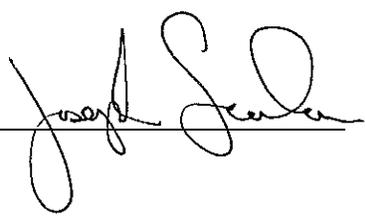
Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUTANK	Leachate Storage Tank	336.1212(4)(c)	336.1284(l)
EUENGINE	Exempt Internal Combustion Engine	336.1212(4)(d)	336.1285(g)

EUTANK – This tank is a 500,000 gallon AST for leachate collection. While the leachate may be recirculated back into the landfill, however it is currently being sent to a wastewater treatment plant and not recirculated. Based on annual leachate volume and leachate VOC concentration, the leachate is considered a non-VOC containing liquid and is exempt from inclusion in the ROP.

EUENGINE – K&W does not have reciprocating internal combustion engines (RICE) equipment that meets the requirement definitions under the MACT Subpart ZZZZ and NSPS Subpart JJJJ for stationary RICE or stationary SI ICE respectively. The RICE and/or SI ICE equipment at K&W are classified as nonroad engines and do not meet the definition of stationary engines.

SUMMARY

No violations of ROP #MI-ROP-N6039-2012 were observed at the time of this inspection and the facility appears to be i compliance with the ROP.

NAME 

DATE 10/9/15

SUPERVISOR _____