

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

N808530929

FACILITY: S.C. Holdings, Inc.		SRN / ID: N8085
LOCATION: 2301 TWO MILE & BEAVER RD, KAWKAWLIN		DISTRICT: Saginaw Bay
CITY: KAWKAWLIN		COUNTY: BAY
CONTACT: Phil Mazor , Remedial Project Manager		ACTIVITY DATE: 09/01/2015
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Site inspection for leachate remediation system at closed landfill. sgl		
RESOLVED COMPLAINTS:		

AQD District Staff conducted a scheduled site inspection of the Closed Hartley & Hartley Landfill, located at 2301 Two Mile and Beaver Road, Kawkawlin, Michigan (N8085). The facility is permitted for a leachate treatment/remediation system. The referenced system is permitted under Permit to Install no. 209-08, issued on September 22, 2008. Mr. Phil Mazor, District Manager for SC Holdings LLC, met Staff onsite and answered questions regarding the existing system and permit requirements. At the time of the inspection the treatment system had been down due to PLC related problems since March 2015.

Trial operations at the facility began July 6, 2009. The first weekly sampling was conducted on July 11, 2009. The last site visit was conducted on September 28, 2009.

**Emission Unit Summary -**

The permit consists of one leachate treatment system/Emission Unit (EU) EULEACHATETRTMNT. The EU is housed in a temperature controlled building at the southeast end of the facility, accessible on 2-mile road. The EU consists of multiple components including:

- Influent holding tank - collects influent leachate waters from recovery well network ( apx. 12 K gallons)
- Oil-Water Separator - first stage of treatment, allows for separation of free phase product from influent leachate
- Oil holding tank - collector for free phase product
- Aeration tank - second stage of treatment uses air stripping technology from an onsite blower to remove contaminants from leachate waters (apx 12 K gallons)
- Passive Carbon adsorbtion system - activated carbon system for treatment of vapors/gases generated via oil-water separator components of system (one 55-gallon drum of activated carbon)
- Forced Carbon adsorbtion system - activated carbon system (2 cannisters, dual stage) for treatment of vapors/gases generated by system aeration tank

In addition, the treatment system has at key points sump and transfer pumps to transfer liquids thru the system. When operational the system treats approximately 10,000 gallons per day. Treated leachates/effluent are transferred to a loadout tank located north of the housed treatment system. One stack is associated with the passive and forced carbon adsorbtion systems, SVCONTROL1 and SVCONTROL2, respectively. Stacks constructed were noted to be in compliance with Permit 209-08.

Facility staff report that since the initial construction, that there has been no installation, construction, reconstruction, relocation or modification that would warrant notification supplemental notification of the District office. At present time the facility plans at a future date to discharge effluent waters directly to the Kawkawlin waste water treatment system. Some modifications as far as piping runs have been installed in anticipation of that date but they do not impact the operation of EULEACHATETRTMNT. However, it appears that in order to meet discharge requirements the facility may need to install a second aeration tank to extend the treatment time of the leachate/influent waters. Upgrades from the existing to a newer PLC unit are anticipated to be conducted later in 2015.

The facility is not required to report annual emissions as part of the MAERS reporting system. In addition, no complaints or violation notices are of record for the facility.

**Compliance Evaluation -**

As previously indicated the treatment system was down at the time of the inspection. Mr. Mazor reported that the system has been shut down for the past two winters due to freezing temperatures. When they attempted to restart the system in March 2015, it was determined that the PLC unit for the system had been damaged, initial repairs were made after a delay in finding replacement parts. Additional electronic problems were identified following the initial repairs to the system, and the facility anticipates repairs being completed yet that week.

#### Design and Equipment Parameters -

Permit 209-08 requires the installation, maintenance and operation of the passive and forced carbon control systems in order to be able to operate EULEACHATETRTMNT (S.C. IV.1 &2). All equipment including the carbon control systems appeared to be well maintained.

#### Process/Operational Restrictions -

Under the referenced permit, the facility is not allowed to operate EULEACHATETRTMNT unless a Malfunction Abatement Plan (MAP) for both the forced and passive carbon control systems has been implemented and maintained. (S.C. III.1) A review of District files identified an approved MAP dated October 16, 2008. A review of maintenance logs for the system maintained onsite indicated that the MAP had been implemented, and the equipment maintained in compliance with the permit.

#### Testing/Sampling -

Under Permit 209-08, the permittee is required to verify VOC emission rates from SVCONTROL2. Testing is required to occur within 180 days after commencement of trial operation and at least twenty days after a carbon change out of the first -stage canister (forced carbon control system). (S.C. V.1) The facility is also required to submit a complete test plan to AQD no less than 30 days prior to testing. The test plan must also be approved prior to testing, and the test results submitted to AQD within 60 days following the last test date.

A review of readily available records failed to find copies of a submitted test plan, documentation of AQD test plan approval or a copy of the required test report required under condition S.C. V.1. The facility reports that a number of operational issues occurred ultimately resulting in a total of only 51 operational days for the first 6-months and only 98 days in the first year of operation. The facility reported that opposed to 180 calendar days to begin air sampling, they initiated sampling after reaching 98 process days (apx. 300 calendar days). The first sample was collected on May 25, 2010. Subsequent sampling was done on June 10, 2010, November 23, 2010, February 4, 2011 and May 27, 2011. Sample analysis for air samples per TO-18 (volatiles) was conducted at minimum for samples collected from the influent and effluent streams of the forced carbon system. In addition, the facility uses dragger tubes to evaluate and monitor the carbon vessels for breakthrough.

Further evaluation of the permit condition and associated violation, indicated that there was no emission limit directly associated with the required testing condition. Emission limit compliance per the permit is based on calculated values generated from leachate influent and effluent analytical results and total flow for the period. A discussion with AQD TPU Staff indicated that without a correlating emission limit in the permit, that it would be difficult to determine and approve an appropriate test method/plan for the facility, and that despite the flaw in the permit, the test methods used appeared to be acceptable based on the nature of the system. Based on these discussions and evaluation of test data provided, it appears that the testing conducted by the facility met the intent of the permit, though no test plan, of formal test report were received by AQD.

#### Emission Limits -

EULEACHATETRTMNT is limited to VOC emissions of 1 ton per year. Emissions are based on calculations specified in the permit that uses leachate influent and effluent concentrations. A review of emissions reports submitted by the facility since July 11, 2009, indicated that emissions are well below the permit limits, and that calculations are being conducted in compliance with the methods outlined in the permit appendix.

#### Monitoring/Recordkeeping -

**Under Permit 209-08 the facility is required to monitor and/or record;**

- the flow rate (weekly for first month, then monthly thereafter) ,
- total VOC concentration of aeration tank influent stream waters (weekly for first month, then monthly thereafter) ,
- total VOC concentration of aeration tank effluent stream waters (weekly for first month, then monthly thereafter) ,
- carbon change out dates, and
- monthly and 12-month rolling emission rates

Records contained in the district files indicate that the referenced data has been collected and recorded in general compliance with the permit.

**Summary -**

AQD District Staff conducted a scheduled site inspection of the Closed Hartley & Hartley Landfill, located at 2301 Two Mile and Beaver Road, Kawkawlin, Michigan (N8085). The facility is permitted for a leachate treatment/remediation system. The referenced system is permitted under Permit to Install no. 209-08, issued on September 22, 2008. Mr. Phil Mazor, District Manager for SC Holdings LLC, met Staff onsite and answered questions regarding the existing system and permit requirements. At the time of the inspection the treatment system had been down due to PLC related problems since March 2015. The facility is presently contemplating addition of a second aeration tank and has inquired about as to whether a new permit application would be required.

One Compliance issue was identified during record reviews following the initial inspection. This was failure to submit a test plan for emissions sampling prior to testing, and submittal of the final test report. (Condition V.1). The company has been notified of the violation, however based on discussions with AQD TPU Staff, and evaluation of the permit, it appears that monitoring/ testing activities conducted onsite meet the intent of the permit condition and no VN will be issued.

NAME Asharon M. BlaxDATE 9/23/15SUPERVISOR C. Hase