

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N600969169

FACILITY: SAUK TRAIL HILLS DEVELOPMENT		SRN / ID: N6009
LOCATION: 5011 S LILLEY RD, CANTON TWP		DISTRICT: Detroit
CITY: CANTON TWP		COUNTY: WAYNE
CONTACT: CHRISTINA PEARSE , ENVIRONMENTAL MANAGER		ACTIVITY DATE: 09/11/2023
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection, FY 2023		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION:: September 11, 2023
INSPECTED BY: Jonathan Lamb, EGLE- AQD Detroit
PERSONNEL PRESENT: Christina Pearce, Environmental Manager
FACILITY PHONE NUMBER: 734-231-8217
CONTACT EMAIL: cpearse@republicservices.com

FACILITY BACKGROUND

Sauk Trail Hills Development is a solid waste landfill facility. The facility collects solid waste five days per week, with additional collection times on Saturday if needed. The facility began accepting waste in 1974. The landfill plans to operate for about fifteen more years. Sauk Trail is located near the intersection of Haggerty Road and Michigan Avenue in Canton, Michigan. Currently, this facility is considered a major source, and is operating under Renewable Operating Permit (ROP) MI-ROP-N6009-2023, Section 1. Note: Canton Renewables operates under Section 2 of this ROP.

COMPLAINT/COMPLIANCE HISTORY

No Violation Notices (VN) have been issued regarding this facility since the last inspection.

INSPECTION NARRATIVE:

The facility was performing testing of two utility (open) flares (EUOPENFLARE4200 and EUOPENFLARE1500) . During the testing, I met with Christina Pearce of Sauk Trail to discuss the testing and operations at the landfill. The facility receives waste from approximately 6:00 AM to 4:30 PM, Monday through Friday, with some occasional Saturdays. There are eleven employees on site. The facility accepts waste mainly from local municipalities (mainly Wayne, Washtenaw, and Oakland Counties), and accepts 2500-3000 tons of waste daily. The waste received is approximately 70% municipal solid waste with the remaining 30% consisting of "other" waste (construction/demolition waste and special waste). The facility is permitted to accept asbestos waste but has not accepted asbestos waste the past several years. The facility does not accept wastewater sludge or compost. The facility estimates that there is less than 10 years of disposal area left at the current permitted site; the facility has no plans at this time to expand once the site is filled to capacity.

The facility is currently using auto fluff and soil as daily cover. There were no issues with odors or uncovered waste observed during the visit and erosion appeared to be minimal. Trucks enter and leave from Van Born Road on the south side of the landfill. The facility uses a water truck to control dust on site.

Gas collected by the landfill is sent to Canton Renewables for processing into renewable natural gas (RNG). Excess gas which is not able to be processed is controlled by the two open flares. Leachate is collected throughout the landfill and stored in a 330,000-gallon tank, which was installed in 2020.

There are two 500-gallon diesel tanks and one 500-gallon gasoline tank which are used to fuel vehicles on site. These tanks are exempt per Rule 284(2)(g)(ii).

APPLICABLE RULES/PERMIT CONDITIONS

Sauk Trails is currently operating under Section 1 of ROP MI-ROP-N6009-2023, issued on April 4, 2023. During the ROP renewal, Sauk Trail and Canton Renewables were combined in the ROP as one stationary source under SRN No. N6009; Canton Renewables is Section 2.

ROP MI-ROP-N6009-2023, Section 1, Applicable Conditions:

EUASBESTOS

NOT EVALUTED. The facility has not accepted asbestos waste since 2013.

FGLANDFILL-000

IN COMPLIANCE. The facility maintains a gas collection and control system (GCCS), as required. All collected landfill gas is routed to either Canton Renewables or one of two open flares for control. All monitoring, recordkeeping, and reporting is maintained and submitted in a timely manner, if required. Facility complies with the requirements of 40 CFR Part 62, Subpart 000.

FGLANDFILL-AAAA

IN COMPLIANCE. The facility maintains a gas collection and control system (GCCS), as required. All collected landfill gas is routed to either Canton Renewables or one of two open flares for control. All monitoring, recordkeeping, and reporting is maintained and submitted in a timely manner, if required. Facility performs surface monitoring on a quarterly basis and corrects any exceedances of the 500 ppm methane limit in a timely manner. Facility complies with the requirements of 40 CFR Part 63, Subparts A and AAAA.

FGACTIVECOLL-000

IN COMPLIANCE. The facility maintains a gas collection and control system (GCCS), as required. All collected landfill gas is routed to either Canton Renewables or one of two open flares for control. All monitoring, recordkeeping, and reporting is maintained and submitted in a timely manner, if required. Facility complies with the requirements of 40 CFR Part 62, Subpart 000.

FGACTIVECOLL-AAAA

IN COMPLIANCE. The facility maintains a gas collection and control system (GCCS), as required. All collected landfill gas is routed to either Canton Renewables or one of two open flares for control. All monitoring, recordkeeping, and reporting is maintained and submitted in a timely manner, if required. Facility monitors the wells for temperature, flow rate, pressure, nitrogen, oxygen, and carbon dioxide on a monthly basis and takes corrective actions in a timely manner if any of the measured parameters are outside compliance or operational range. Facility maintains an up-to-date map of the GCCS. Facility complies with the requirements of 40 CFR Part 63, Subparts A and AAAA.

FGOPENFLARES, FGOPENFLARE-000-1, and FGOPENFLARE-AAAA-1

IN COMPLIANCE. Facility reported 70.24 tons of CO emitted in 2022, below the permit limit of 222 tons. Testing on September 11, 2023, demonstrated the following for each flare:

- EUOPENFLARE4200: Visible emission readings demonstrated zero (0) minutes, 1.4 seconds of accumulated visible emission time over a 2-hour period. The average net heating value of the combusted gas was 17.40 MJ/scm with an average gas exhaust exit velocity of 46.2 ft/sec.
- EUOPENFLARE1500: Visible emission readings demonstrated zero (0) minutes, zero (0) seconds of accumulated emission time over a 2-hour period. The average net heating value of the combusted gas was 13.10 MJ/scm with an average gas exhaust exit velocity of 35.53 ft/sec.

These results demonstrate compliance with the requirements of the ROP and the performance standards set in 40 CFR 60.18(c) and 40 CFR 63.11(b), which require less than 5 minutes of visible emissions over a 2-hour period, a net heating value of the combusted gas greater than 7.45 MJ/scm, and a maximum exit velocity less than 60 ft/sec.


Flow meters for each flare are calibrated approximately every 18 months. All monitoring and records are maintained, as required, and submitted in a timely manner.

FGCOLDCLEANERS

IN COMPLIANCE. Cold cleaners are operated and maintained in accordance with permit requirements.

FINAL COMPLIANCE DETERMINATION

Sauk Trail Hills Development appears to be operating in compliance with MI-ROP-N6009-2023, Section 1, and other applicable State and federal regulations.

NAME 

DATE 8-9-24

SUPERVISOR JK