

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

N236944351

FACILITY: ADRIAN LANDFILL	SRN / ID: N2369
LOCATION: 1970 NORTH OGDEN HWY, ADRIAN	DISTRICT: Jackson
CITY: ADRIAN	COUNTY: LENAWEЕ
CONTACT: CHRISTINA PEARSE , District Engineer	ACTIVITY DATE: 04/04/2018
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance
	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection of MI-ROP-N2369-2014 and associated landfill activities. Alex Whitlow, WMRPD, was also present during the inspection.	
RESOLVED COMPLAINTS:	

Contact

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Purpose

This was a scheduled inspection on 4/4/2018 of the landfill located at 1970 North Ogden Highway, Adrian, MI. The purpose of the inspection was to determine compliance with the Renewable Operating Permit (ROP) number MI-ROP-N2369-2014. I arrived on site with Alex Whitlow (WMRPD) at about 10am and met with Connor Haydon, Dana Oleniacz, and Jeremy Chrobak.

Background

Adrian Landfill is a mothballed facility that has not accepted waste since 2013. The facility operates the gas collection portion of the gas collection and control system (GCCS) as required by the federal New Source Performance Standard (NSPS) in 40 CFR Part 60, Subpart WWW and the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63, Subpart AAAA. These rules apply to Municipal Solid Waste (MSW) landfills.

Yearly Michigan Air Emission Reporting System (MAERS) submittals from this source as well as the adjacent landfill gas (LFG)-to-energy plant, Adrian Energy (SRN: P0426), indicate declining emissions. This is expected an expected outcome since the facility does not currently accept waste.

I last inspected this facility in July 2016.

Compliance Evaluation**EULANDFILL**

This is the emission unit (EU) that discusses general MSW landfill operations, and includes a methane concentration of not more than 500ppm above background levels. Methane concentrations are checked quarterly through surface monitoring of the landfill. The first quarter of 2017 had 1 reported exceedance at well LCSR3, which was subsequently monitored for the next month where monitoring data shows a decrease to below 500ppm above background. The second quarter of 2017 showed no exceedances. Attached are the third and fourth quarter monitoring reports, which also did not identify any points exceeding 500ppm methane above background levels.

This EU also includes conditions that require the LFG to be routed to either a flare, control system, or treatment

system. Adrian Landfill operates a flare as a backup control measure to the primary treatment system and combustion equipment at the adjacent Adrian Energy facility. A record of flare operations is maintained with a startup/shutdown/malfunction (SSM) report. These reports are sent in semiannually with ROP certifications. Attached is an example of flaring event that occurred due to Adrian Energy having a unit go down. Adrian Energy keeps similar records.

EUACTIVECOLL

This is the EU that includes the portions of the GCCS that the facility is responsible for, including the gas moving equipment that draws LFG from wells and onto control equipment. Continuous compliance for conditions in this section directly relate to wellhead monitoring and maintenance. Attached is the first quarter wellhead data that monitors for oxygen percent, temperature, and well pressure in accordance with 40 CFR 60.753(c). Deviations are reported during semi-annual and annual ROP certification reports as well as intermittently to request alternative timelines for exceedances of set parameters in accordance with 40 CFR 60.755 and Special Condition VI.3a of this EU. The facility continues to track SSM events and reports them semi-annually.

There were no times when the entire collection system was not in operation in excess of 5 days. There were four instances during 2017 when the backup flare and Adrian Energy were down in excess of an hour due to loss of power. These are reported in accordance with 60.757(f)(3). The flare is not equipped with a bypass, therefore LFG was not discharged directly to ambient air.

Attached is the most recent as-built for the facility showing the network of gas wells.

EUOPENFLARE

This EU is for the backup flare that is operated by the landfill during times when the LFG-to-energy plant operated by Adrian Energy is down. The flare is a non-assisted open flare that is continuously monitored for flow and has both automatic and manual startup and shutdown options. SSM event logs related to the flare show disproportionate startups due to the flare being lit manually when vacuum is below the set point while automatic shutdown occurs normally after the flaring event ceases. This is included in the SSM semi annual report.

The flare was not operating while on site, and thus no visible emissions were observed.

Stack testing of the flare was performed in accordance with NSPS WWW in 2006 and found to be in compliance.

EUASBESTOS

The landfill is not actively accepting waste. Historic records of asbestos containing waste are kept on file at the site. No notifications have been made that relate to excavating or otherwise disturbing areas where asbestos containing waste is being held since my last inspection in 2016.

EUAIRSTRIPPER

This is the EU for a water treatment system using an air stripper to remove VOC from groundwater. Attached are the most recent analytic results from water samples taken in the area as well as the 12-month rolling total of VOC. The 12-month rolling total of VOC through February 2018 was 0.291 pounds, which is lower than the permitted limit of 0.003 tons, or 6 pounds per year.

FGCOLDCLEANERS

This is the flexible group (FG) for cold cleaners that are exempt from required to have a PTI by Rule 281(2)(h) or 285(2)(r)(iv). All cold cleaners have since been removed because the facility is mothballed.

Compliance Determination

After on site inspection and review of MAERS submittal, I have determined that Adrian Landfill is in compliance with State of Michigan and federal air quality rules and regulations, including MI-ROP-N2369-2014.

NAME Zack Durban DATE 5/14/18 SUPERVISOR [Signature]