

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

N280431029

FACILITY: CENTRAL SANITARY LANDFILL		SRN / ID: N2804
LOCATION: 21545 CANNONVILLE RD, PIERSON		DISTRICT: Grand Rapids
CITY: PIERSON		COUNTY: MONTCALM
CONTACT: Roger Rockburn, Landfill Manager		ACTIVITY DATE: 09/03/2015
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:00 P.M. on September 3, 2015, Air Quality Division staff Dave Morgan conducted a scheduled inspection of the Central Sanitary Landfill located in Pierson. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations as well as Renewable Operating Permit (ROP) No. MI-ROP-N2804-2014. Accompanying AQD staff on the inspection was Roger Rockburn, Landfill Manager.

#### FACILITY INFO

The Central Sanitary Landfill (CSL) is a solid waste landfill which accepts municipal waste, non-hazardous special waste, and construction and demolition debris and has a design capacity of 13.0 million cubic meters. Because the design capacity was increased after May 30, 1991, the landfill is subject to the requirements of 40 CFR Part 60, Subpart WWW.

#### COMPLIANCE EVALUATION

##### EULANDFILL:

The company conducted Tier II sampling per Subpart WWW in April 2011. As a result of the sampling, the site-specific non-methane organic compound (NMOC) concentration was 255 parts per million by volume (as hexane) and the NMOC emission rate was determined to be no more than 45 megagrams per year through 2015. The company's next Tier II test will be due in April 2016. Because NMOC emissions were determined to be below 50 megagrams per year for the next five years, the company is not required to install a landfill gas collection and control system under Subpart WWW. Despite this, the company has an active gas collection and control system, installed in 2006, that consists of approximately 32 vertical and horizontal wells, and an open flare. In 2015, the company installed three new wells and re-drilled three other wells. It is noted that the company is not required to operate or monitor the collection system in accordance with Subpart WWW until NMOC emissions have exceeded the 50 Megagrams per year threshold. The company does monitor and balance the gas collection system at least once per month.

The company is maintaining all recordkeeping on-site and in accordance with the ROP. These records include the year-by-year waste acceptance rate, waste in place records, the design capacity report, and cover inspection records. As of the inspection date, the estimated waste in place is 7,667,402 cubic yards. The next waste survey will occur in March 2016. Well monitoring records are also kept.

All semi-annual and annual certification reports have been submitted in accordance with the ROP and Subpart WWW.

##### EUOPENFLARE:

In 2006, the company installed an open flare with a rated capacity of 4,000 scfm to control captured landfill gas. Based on company records, the gas flow to the flare ranges from around 800 to 1,000 cfm. At the time of the inspection, flow to the flare was around 845 scfm.

The flare is fully operational and operates on a continuous basis. No visible emissions were observed from the flare at the inspection. The company electronically monitors and records the gas flow rate and presence of the pilot flame as specified in the ROP on a continuous basis. Attached to this report are continuous flare records. During the inspection, the thermocouple on the flare showed a temperature above 1,326°F and a flame was present as required by the ROP. If there is no flame, a sensor is tripped and the gas mover equipment is shutdown. Attempts to relight the flare is conducted automatically. If unsuccessful, the flare is relit manually.

The company has an operations manual on site for proper maintenance and operation. Along with daily observations, a weekly maintenance is performed on the flare and the flare is shutdown once per month for additional maintenance. All maintenance activities are recorded in a log book which was reviewed on site.

Flare shutdown records were reviewed on site for 2015. Ten downtime events were documented in 2015 which were mainly due to power surges/outages. The company is monitoring flare data and ensuring that downtime events are properly recorded.

**EUAIRSTRIPPER:**

There is a groundwater air stripping unit (QED Environmental Systems Model EZ12.6SS) installed under Rule 290. Exhaust air is vented through a stack with a 6 inch diameter and 7 foot height from the ground. No visible emissions were observed from the air stripper during the inspection.

The company conducts semi-annual monitoring of the VOC concentration in the influent and effluent of the air stripper in order to calculate emissions. On a monthly basis, the company calculates VOC emissions using the semi-annual VOC concentrations. From January to July 2015 records show VOC emissions were calculated to be no higher than 1.86 pounds per month which is below the 1,000 pound per month limit. In addition, all emissions are below 20 pound per month thus meeting emission limits for constituents with an applicable ITSL or IRSL. Records are attached.

**EUASBESTOS:**

The Central Sanitary Landfill does not accept asbestos waste and there is no documentation that the site has accepted it in the past. This section of the ROP should be revisited during the next ROP renewal period.

**EUCOLDCLEANER:**

There are two cold cleaners at the facility covered under Rule 707 in which no non-compliance issues have been identified.

**Miscellaneous:**

There are several liquid storage tanks at the facility which are exempt from permitting under Rule 284.

No odors were detected off-site.

**SUMMARY**

CSL is in compliance with all applicable requirements.

NAME  DATE 9/8/15 SUPERVISOR PAB