

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

N289625871

FACILITY: C&C Expanded Sanitary Landfill		SRN / ID: N2896
LOCATION: 14800 P Drive North, MARSHALL		DISTRICT: Kalamazoo
CITY: MARSHALL		COUNTY: CALHOUN
CONTACT: Glen Goestenkers , Landfill Manager		ACTIVITY DATE: 06/25/2014
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On June 25, 2014 AQD staff (Matt Deskins) went to conduct a scheduled unannounced inspection of C & C Landfill located in Marshall, Calhoun County. C & C Landfill is a licensed Type II municipal solid waste landfill and is subject to the federal New Source Performance Standard (NSPS), 40 CFR Part 60, Subpart WWW, and the National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart AAAA. The purpose of the inspection was to determine the landfill's compliance with the preceding federal air regulations as well as state air regulations that are contained within the facilities Renewable Operating Permit (ROP) No. MI-ROP-N2896-2011a. The ROP used to be a sectioned permit with C&C Energy (f.k.a. Gas Recovery Systems (GRS)) as section 2. Upon the most recent ROP renewal cycle both the landfill and C&C Energy requested that they be issued separate ROPs which the AQD has allowed at other facilities. C&C Energy was later issued the SRN P0222 but they are still considered one stationary source with the landfill for all other purposes. Staff departed the Kalamazoo District Office at approximately 9:30 a.m.

AQD staff arrived at the C & C Landfill at approximately 10:30 a.m. Staff had circled the perimeter roads of the landfill first to see if any odors could be detected and none were noted. Upon entering the facility, staff noted that Katie Venchuk and Lee Anne Thor of our Office of Waste Management and Radiological Protection Division (OWMRP) were there. They were there meeting with Glen Goestenkers (Landfill Manager), Elena Goodhall (Environmental Manager), and Stephanie Goodman (Environmental Manager) of Republic Services regarding the cell construction that was on-going. Katie and Lee Anne then departed to go out to where that activity was occurring. Staff then introduced them self to Glen, Elena, and Stephanie and stated the purpose of the visit. Staff then gave Glen their business card and offered the DEQ's "Environmental Inspections Brochure", but he stated he didn't need another one. Glen then asked staff what they needed to see and staff mentioned that they would like to review the various records required to be kept by the ROP. The following lists the emission units contained in the ROP along with current pertinent information. A lot of the conditions contained in the ROP are requirements that have already been completed and/or are future requirements for when the landfill is closed. Staff also asked Glen some general questions and those will be included as well.

Note: Stephanie was present for the whole inspection but Glen had to leave at time to take care of landfill operations. Elena had gone out to accompany Katie and Lee Anne with their visit.

As mentioned in the opening paragraph, C & C Landfill's ROP does not contain two sections anymore and the following emission units and/or flexible groups are contained in it: EULANDFILL, EUACTIVECOLL, EUASBESTOS, EUFLARE1, EUGWTS (Rule 290), and EUCOLDCLEANERS. The two enclosed flares that used to make up the flexible group FGENCLOSEDFLARES are no longer there. They replaced those two units with an open flare (Manufactured by Zink and rated for 3,000 scfm) and incorporated that unit into their ROP and removed the enclosed flare portion. The only flexible group now is FGCOLDCLEANERS for any cold cleaners that the facility might have.

EULANDFILL: Appears to be in COMPLIANCE

According to Glen, C & C Landfill is taking in around 1500 tons of waste a day and they have annual reports of the amount of waste in place that gets submitted annually to OWMRP. They also have approval from OWMRP to re-circulate up to 12,000 gallons of leachate per day but Glen said that they might do 6,000 when they do it. The facility has an Odor Management Plan as required and it is implemented should any odiferous wastes be brought in. Currently, the site is taking in some sludge that Glen described as "Grit and Screenings" from the City of Kalamazoo but the AQD hasn't received any recent complaints of odors pertaining to any waste, landfill gas, or sludge type smells. Staff then asked Glen if they've gotten any complaints called in directly to them and he said that they haven't. The

facility has an approved active gas collection system as well as associated control system (EUFLARE1) that the gas is routed to as required. Currently, the landfill gas produced is piped to C&C Energy where it is combusted in their internal combustion engines or turbine for electrical generation. The open flare is mainly used for back up purposes should the engine(s) or turbine go down but they also run it if necessary to keep a consistent vacuum on the well field (they like to have it around 55 inches of water column. Staff then asked about well field and surface emissions monitoring and Stephanie stated that Monitoring Control and Compliance (MCC) out of Ohio is still conducting that monitoring currently but they will be switching to SCS starting July 1st. She said that corporate did a request for proposal and SCS was cheaper for C&C Landfill. Quarterly surface emissions monitoring is being conducted and the facility appears to be keeping the appropriate records as required. The records staff reviewed included instrument calibration data, weather data, and a map showing the route traversed while doing the monitoring. MCC uses a portable analyzer (Foxboro/Thermo TVA 1000 FID) for their surface emissions monitoring. Staff noted that there weren't any reported exceedences for the 1st two quarters of 2014. MMC is also conducting the monthly cover integrity checks as part of their monthly well field sampling routine. The facility has a Startup, Shutdown, and Malfunction Plan (SSM) on as required and Stephanie was going to check to see if the open flare needed to be added to it. The facility has also been submitting the required semi-annual and annual ROP Certifications and SSM reports to the district office on time.

EUACTIVECOLL: Appears to be in COMPLIANCE

The facility has an up to date ASBUILT drawing showing the existing collection system and proposed expansion areas that they submitted to the AQD and OWMRP. It appears that the collection system is constructed of appropriate materials (HDPE and/or PVC is used). Currently, the facility has 161 NSPS monitoring points (vertical and horizontal wells, leachate risers and cleanouts, etc.). Some of wells are combo wells (wells with liquid pumps) and they are equipped with Landtec wellheads. The facility is conducting monthly wellhead monitoring using an Envision – Nomad and/or Landtec GEM gas analyzer and are recording static pressure (vacuum), oxygen, and temperature as required. If any of these parameters exceed operational standards during monitoring, the timeframe for corrective actions appears to be being adhered to. If corrective actions do not bring a well back into compliance, the facility has been requesting alternate compliance timelines and/or operating scenarios as required. Staff reviewed the 1st two quarters of data for 2014 and did not note any issues. The facility has been submitting the required semi-annual and annual ROP Certification Reports and SSM Reports on time.

EUASBESTOS: Appears to be in COMPLIANCE

The facility has a perimeter fence surrounding the entire property which should adequately deter access by the general public as required. The facility appears to be keeping all the required records which include: shipping records (manifests) of the generator, transporter, and quantity of asbestos accepted; and a map showing the depth and location of all buried asbestos, etc.

EUFLARE1: Appears to be in COMPLIANCE

As mentioned previously, the flare is manufactured by Zink and rated at 3,000 scfm. It was installed in 2013 and it replaced the two enclosed flares. Staff did not observe any visible emissions coming from it outside of the presence of the flame and heat. It was tested and the net heating value and other requirements were met. It is equipped with a heat sensor to detect flame presence and a digital data recorder that records flow and temperature. It is also equipped with a pneumatic valve that automatically closes if the whole system (engines, turbine, and flare) should shut down to prevent landfill gas from venting uncontrolled to the atmosphere. The facility appears to be keeping the appropriate records and submitting the appropriate reports as they pertain to the open flare.

EUGWTS/ Rule 290: Appears to be in COMPLIANCE

The groundwater treatment system (Air Stripper) on site has not been in use since March of 2004 under an approval from the OWMRP. The treatment system was originally put in place as a requirement of an OWMRP Remedial Action Plan to address groundwater contamination. Over the years, contaminant levels have hardly been detected in the groundwater, so OWMRP is allowing the facility to just monitor the situation. It appears the facility still wishes to keep the treatment system in their ROP though just in case they do have to restart it in the future.

FGCOLDCLEANERS: Appears to be in COMPLIANCE

The Coldcleaner is located in maintenance garage and its lid was closed. Appropriate operating instructions and cleaner information are posted. No halogenated solvents are used.

Staff thanked Glen and Stephanie for their time and departed the facility at approximately 12:45 p.m.

INSPECTION CONCLUSION: The facility appears to be in COMPLIANCE with the terms and conditions of MI-ROP-N2896-2011a at the present time.

NAME Matt Darker

DATE 7-9-14

SUPERVISOR MO 7/9/2014