

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

N289633991

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| 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: 03/23/2016 |
| STAFF: Matthew Deskins | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Unannounced Scheduled Inspection | | |
| RESOLVED COMPLAINTS: | | |

On March 23, 2016 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. 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.

AQD staff arrived at the C & C Landfill at approximately 1:20 p.m. after conducting an inspection of C&C Energy and having lunch. Staff had circled the perimeter roads of the landfill twice to see if any odors could be detected and none were noted. Winds were out of the north. Staff then proceeded to the landfill entrance and then into the office area. Once in the office, staff introduced them self to Deb (Office Employee), stated the purpose of the visit, and then asked if Glen Goestenkers (Landfill Manager) was available. Deb said that he was currently outside because their scales went down and they had people out to repair them. Glen ended up coming into the office a few minutes later and staff introduced them self and stated the purpose of the visit. Staff then offered Glen the DEQ's "Environmental Inspections Brochure", but he stated he had enough of them. 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.

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 back in 2013 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 1400 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. Glen said that they recirculated about 300,000 gallons last year and they spray the leachate right on the active area. The facility has an Odor Management Plan as required and it is implemented should any odiferous wastes be brought in. The site is still 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. 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 inquired about well field and surface emissions monitoring and it appears that the landfill switched from using Monitoring Control and Compliance (MCC) out of Ohio to SCS Field Services back in the summer of 2014. 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. SCS uses a portable analyzer (Trimble Data FID) for their surface emissions monitoring. Staff noted that there weren't any reported exceedences for the 4th quarter of 2015 and the 1st quarter of 2016. SCS 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. The facility has also been submitting the required semi-annual/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 149 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's consultant (SCS) is conducting monthly wellhead monitoring using a Landtec GEM 5000 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 requested alternate compliance timelines and/or operating scenarios as required. Staff reviewed several monthly reports 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 and is used mainly as a back-up device to the engines and turbine at C&C Energy. Staff did not observe any visible emissions since the flare was not operating due all gas being directed to the C&C Energy facility. 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

As has been mentioned in previous inspection reports, 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 and it is serviced by Safety Kleen.

Staff then took a ride with Glen around the perimeter road of the landfill. Once back to the office, staff thanked Glen for his time and departed the facility at approximately 3:30 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 Darbin

DATE 3-31-16
3-13

SUPERVISOR LA 4/7/2016