

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

N289645360

FACILITY: C&C Expanded Sanitary Landfill		SRN / ID: N2896
LOCATION: 14800 P Drive North, MARSHALL		DISTRICT: Kalamazoo
CITY: MARSHALL		COUNTY: CALHOUN
CONTACT: Marguerite Davenport , Operations Manager		ACTIVITY DATE: 07/25/2018
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On July 25, 2018 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-N2896-2017. 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. Staff departed for the facility at approximately 9:45 a.m.

AQD staff arrived at the C & C Landfill at approximately 10:35 a.m. Staff first circled the perimeter roads of the landfill to see if any odors could be detected and none were noted. Staff then proceeded to the landfill entrance and then into the office area. Once in the office, staff introduced them self to Marguerite Davenport (Operations Manager) and stated the purpose of the visit. Marguerite had recently taken over for Glen Goestenkors. Marguerite then asked staff what they would like to see and staff mentioned that they would like to review the various records required to be kept by the ROP which included quarterly surface emissions monitoring, monthly wellfield monitoring, asbestos records, etc.

NOTE: Staff also made Marguerite aware that the landfill will eventually be subject to the requirements of 40 CFR Part 60 Subpart XXX. NSPS Subpart XXX is a new NSPS that applies to landfills (eventually it's supposed to replace NSPS WWW) and its applicability is based on the date of the most recent construction permit issued to the landfill. C&C Landfill was issued a new construction permit to expand their waste disposal area on April 16, 2018. However, compliance timelines with the regulation don't start until the landfill actually commences construction on the approved expansion which they haven't done yet. Marguerite said that tentative plans are to start construction in the Spring of 2019.

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 Marguerite 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, EUCOLDCLEANERS, and EURULE290. The landfill used to have two enclosed flares that used to make up a flexible group known as FGCLOSEDFLARES but they were removed. 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.

**EULANDFILL:** Appears to be in COMPLIANCE

According to Marguerite, C & C Landfill is taking in around 2000 to 2200 tons of waste a day during the summer and approximately 1400 tons during winter. They have to keep 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. Marguerite said that they stopped recirculating leachate at the landfill in 2017 due to a new company policy. 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 sludge that Marguerite said comes from the City of Battle Creek. They landfill use to also take some from the City of Kalamazoo. Marguerite said that the sludge

comes in during the months of November through March (winter months) when they stop land applying it. The AQD hasn't received any complaints of odors pertaining to any waste, landfill gas, or sludge type smells in a number of years. 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 and turbine for electrical generation. The open flare is mainly used for back up purposes should the engine(s) or turbine go down. They use to 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) but Marguerite said that isn't done anymore. Staff then inquired about well field and surface emissions monitoring and Marguerite said that SCS Field Services is still contracted to do those. Quarterly surface emissions monitoring is being conducted and the facility appears to be keeping the appropriate records as required. Staff reviewed records for the past six quarters. 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 (either a Landtec TDL-500 or a Trimble Data FID) for their surface emissions monitoring. Staff noted that exceedences (over 500 ppm CH<sub>4</sub>) were reported for the 1<sup>st</sup> quarter of 2018 and 1<sup>st</sup> quarter of 2017. The facility conducted corrective actions in these areas and the required follow-up re-monitoring indicated compliance. 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) 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 175 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. As mentioned previously, SCS is conducting the monthly wellhead monitoring for the landfill and they use 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 the last six 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 monthly disposal maps 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 back 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 to all gas being directed to the C&C Energy facility. It was tested after it was installed 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.

#### **EURULE290: 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 and Marguerite said that is still the case. 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 had allowed the facility to just monitor the situation. Marguerite said that they have recently submitted the paperwork to the DEQ-WRD to terminate their NPDES permit for it.

**FGCOLDCLEANERS: Appears to be in COMPLIANCE**

The parts cleaner is located in the maintenance garage and its lid was closed. It is a Crystal Clean Aqueous Solution heated unit. The aqueous cleaning agent used in it is water based and the VOC concentration in it is miniscule and well under the percentage of VOC required to meet the definition of a cold cleaner.

Staff then took a ride with Marguerite around the perimeter road of the landfill and then on top to the disposal area to check things out. Once back at the office, staff thanked Marguerite for her time and departed the facility at approximately 1:05 p.m.

**INSPECTION CONCLUSION:** The facility appears to be in COMPLIANCE with the terms and conditions of MI-ROP-N2896-2017 at the present time.

NAME Matt DR

DATE 7-30-18

SUPERVISOR MA 7/30/2018

