

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

N295226154

FACILITY: CITY ENVIRONMENTAL SERVICES LF, INC. OF HASTINGS		SRN / ID: N2952
LOCATION: 1899 N M-43 HWY, HASTINGS		DISTRICT: Grand Rapids
CITY: HASTINGS		COUNTY: BARRY
CONTACT: Eric Shafer, District Engineer		ACTIVITY DATE: 07/29/2014
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:00 P.M. on July 29, 2014, Air Quality Division staff Dave Morgan conducted an announced scheduled inspection of City Environmental Services Landfill Inc. (a Waste Management Company) located at 1869 N. Broadway in Hastings. 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-N2952-2012. Accompanying AQD staff on the inspection was Eric Shafer, Division Engineer.

FACILITY DESCRIPTION

The City Environmental Services Landfill, Inc. has a permitted design capacity of 4.48 million cubic yards and accepts approximately 250 tons of waste per day. The landfill consists of a closed disposal cell, various active disposal cells, an active gas collection system, and an enclosed flare. The landfill is subject to the NSPS under 40 CFR Part 60, Subpart WWW. The landfill and associated flare is exempt from New Source Review under Rule 285 (aa) but is covered under ROP No. MI-ROP-N2952-2012.

The landfill is not currently subject the MACT standard under 40 CFR Part 63, Subpart AAAA for Municipal Solid Waste Landfills because the site is not considered a major source of HAPs. The site is subject to 40 CFR Part 61, Subpart M, the National Emission Standard for Hazardous Air Pollutants for Asbestos because the site accepts asbestos waste.

The company also has a venturi air stripper used to purge and treat contaminated groundwater. The air stripper has been operational since 1993.

COMPLIANCE EVALUATION

General Landfill info (EULANDFILL<50):

As a result of the most recent Tier 2 testing conducted in January 2011, the estimated NMOC emission rate through 2015 is 6.3 megagrams (MG) per year which is well below the 50 MG/yr NMOC threshold which would trigger the NSPS gas collection and control system (GCCS) requirements. Accordingly, the landfill will be required to recalculate the NMOC emission rate annually or every 5 years until the NMOC emission rate exceeds 50 megagrams per year. The next Tier 2 test will be due in January 2016.

Records pertaining to maximum design capacity, year-by-year acceptance rate, and amount of waste in place are maintained in accordance with the NSPS. The company last surveyed the waste on May 6, 2014. According to company records there are still approximately 2.19 million cubic yards of waste in place with a permitted capacity of 4.48 million cubic yards.

Active Landfill Gas Collection System:

Although the company is not currently required to operate a GCCS per the NSPS, the company installed and operates an active gas collection and control system in order to prevent off-site migration of landfill gas as well as to control odor. The landfill is currently generating approximately 350 cubic feet of landfill gas per minute.

Once a month, the company monitors the vacuum pressure of the collection header, as well as the oxygen concentration and temperature at each wellhead. The company records the information obtained during monitoring and submits it to the corporate landfill gas management computer system.

It is noted that the company is not required to conduct surface monitoring over the landfill or wellhead monitoring of the GCCS until NMOC emissions exceed 50 MG/yr.

Enclosed Flare (EUENCLOSEDFLARE):

Gas collected from collection system is routed to an enclosed flare. The company records the temperature of the

flare and the gas flow to it on a continuous basis. The enclosed flare was operating at the time of the inspection with a flow rate around 343 scfm and a temperature of 1,538°F. Although temperature and gas flow is monitored, the company is not required under the NSPS to monitor the flare until NMOC emissions exceed 50 MG/yr.

The company conducted a performance test of the enclosed flare on May 31, 2001. No visible emissions were observed from the flare.

Asbestos Waste (EUASBESTOS):

The landfill began accepting asbestos containing waste in December 2003. According to company records, asbestos waste is placed in a consolidated area within the landfill and is covered over immediately. The company is maintaining all required records including the waste shipment information and records of the location, depth, area, and quantity of asbestos-containing waste material within the disposal site. The site has not received any asbestos waste since 2012. In 2012 there were 73 yards of asbestos waste received, which was documented in on-site records.

Because of the size of the property around the fill area, there is a sufficient natural barrier to prevent general access to the fill areas with asbestos containing waste. In addition, the company uses signs to warn employees, haulers and visitors if asbestos waste is being deposited.

Cold Cleaner (EUCOLDCLEANER):

The company has one small maintenance cold cleaner, using mineral spirits, in which no non-compliance issues were identified. At the time of inspection, the lid was closed and operating procedures were posted.

Groundwater Treatment System (EUGWTS):

The groundwater treatment system contains a venturi air scrubber to remediate groundwater contaminated with VOCs. The company monitors and records the VOC concentration of the influent and effluent on a monthly basis through a grab sample.

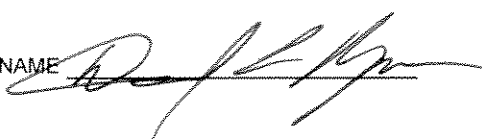
For the past 12 months, no VOCs have been detected in the influent water. Records reviewed on site verify that no VOCs have been detected in samples taken.

Miscellaneous:

The company has a 100,000 gallon leachate storage tank which is exempt under Rule 285(aa). This tank is enclosed in a building to ensure conditions are adequate for biological breakdown of the leachate during the winter. The building is heated with three separate furnaces that burn untreated landfill gas. These heaters are exempt under Rule 282(g) because the sulfur content of the landfill gas would not result in sulfur dioxide emissions above 1 pound per hour.

EVALUATION SUMMARY

City Environmental Services Landfill is in compliance with all applicable requirements. Records are attached.

NAME 

DATE 7/30/14

SUPERVISOR PAB