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

N295254499

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: Matt Rosser , District Manager		**ACTIVITY DATE:** 08/11/2020
STAFF: David Morgan	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 2:30 P.M. on August , 2020, Air Quality Division staff Dave Morgan conducted a 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-N2952-2017. Accompanying AQD staff on the inspection was Don Johnson, Site Manager. All records were received prior to the inspection.

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 Emission Guidelines for Municipal Solid Waste Landfills under 40 CFR Part 60, Subpart Cf. However, until a federal or state implementation plan is approved, the site will continue to operate under New Source Performance Standard (NSPS) for Municipal Solid Waste Landfills under 40 CFR Part 60, Subpart WWW . The landfill and associated flare is exempt from new source review under Rule 285(2)(aa) but is covered under ROP No. MI-ROP-N2952-2017.

The landfill is not currently subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) 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 the NESHAP under 40 CFR Part 61, Subpart M, 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):

The most recent Tier 2 testing was conducted in January 2016 with non-methane organic compound (NMOC) emissions expected to be less than 12.1 megagrams (MG) per year through 2021 which is well below the 50 MG/yr NMOC threshold which would trigger the NSPS gas collection and control system (GCCS) requirements. The landfill is required to recalculate the NMOC emission rate annually or every 5 years until the NMOC emission rate exceeds 50 megagrams per year.

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 recorded waste survey was from April 2020. At that time, there were approximately 2.46 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. At the time of the inspection, approximately 200 standard cubic feet of landfill gas per minute (scfm) was being captured by the collection system.

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 200 scfm and a temperature of 1,555°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. No visible emissions were observed from the flare.

The company conducted a performance test of the enclosed flare on May 31, 2001.

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 company accepted 20 yards of asbestos containing waste in April 2019 and 50 yards of asbestos containing waste in June 2020. Records are maintained in accordance with the ROP and are attached.

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. Mr. Johnson indicated that he would like to replace the unit with an aqueous system, however, the building is unheated in the winter and the unit would freeze.

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 quarterly basis through a grab sample. In addition conducts and records daily inspection and maintenance on the treatment system. The system was observed to be running on the day of the inspection.

Records reviewed show that for the period from July 2019 through June 2020, there was 4.5 million total gallons of water flow and records show that no VOCs have been detected in the influent water samples for the time period. The maximum detection limit for VOCs is 5 micrograms per/liter (ug/L).

Miscellaneous:
The company has a 220,000 gallon leachate storage tank which is exempt under Rule 285(2)(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 can be considered exempt under Rule 282(2)(g) and the sulfur content of the landfill gas would not result in sulfur dioxide emissions above 1 pound per hour ; all other pollutants are also below significance levels. The heaters were not operating on the day of the inspection.

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

NAME David L. Ryan DATE 8/11/2020 SUPERVISOR