

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

N326129588

FACILITY: GLEN'S SANITARY LANDFILL		SRN / ID: N3261
LOCATION: 518 E. TRAVERSE HIGHWAY, MAPLE CITY		DISTRICT: Cadillac
CITY: MAPLE CITY		COUNTY: LEECLANAU
CONTACT: Deb Johnston , Environmental Engineer		ACTIVITY DATE: 05/29/2015
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: 2015 FCE; Site inspection, records review.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation 2015

I inspected the Waste Management (WM) Glen's Landfill to determine compliance with ROP number MI-ROP-N3261-2010 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: clearing following a rain storm, temp. 68, SW wind 10 mph.

Prior to entering the facility, I observed that there were no odors downwind and outside of the facility. No odors were detected inside the facility during the inspection. Additional gas collection wells have been installed this spring and the collected gas is used in the leachate evaporators or directed to a flare if excess. The evaporators and flare were operating at the time of the inspection but there were no visible emissions from either. All haul roads, the plant yard, and the active parts of the landfill had no noticeable visible emissions during the inspection and appeared to be in good repair.

The majority of ROP permit conditions associated with this facility only apply once the facility has reached a non methane organic carbon (NMOC) emissions threshold of 50 Megagrams per year based on testing. As per their last testing performed in December 2011, the facility has not exceeded that threshold. Therefore, only applicable permit conditions are addressed in this report. An application to renew the ROP has been received and the renewal ROP is currently being processed by AQD.

FACILITY DESCRIPTION – Glen's Sanitary Landfill is a municipal solid waste landfill whose design capacity is greater than 2.5 million megagrams or 2.5 million cubic meters. The facility is subject to 40 CFR 60 Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills). Subpart WWW requires a facility whose design capacity is greater than 2.5 million megagrams or 2.5 million cubic meters to obtain a Renewable Operating Permit. The facility is also subject to the Asbestos NESHAP since it accepts asbestos containing materials.

Following are the results of this inspection by applicable ROP condition:

COMPLIANCE EVALUATION**EULANDFILL<50**

V. TESTING/SAMPLING – As a requirement of the ROP and 40 CFR 60 Subpart WWW, the facility is required to perform Tier 2 testing every five years. The last Tier test was completed in December 2011. In the past 12 months, there was no testing performed at the facility. The next Tier 2 test will be performed in 2016.

VI. MONITORING AND RECORDKEEPING - The facility is required to calculate, record, and submit the yearly NMOC emission rate to the AQD. The facility calculates and submits the yearly NMOC emissions through the Michigan Air Emission Reporting System (MAERS). The 2014 MAERS submittal was reviewed and determined to be adequate. The NMOC emission calculations are attached.

VII. REPORTING - Semi-annual deviation reports, annual certifications of compliance, and MAERS were previously reviewed and were submitted timely with proper certification. No deviations have been reported.

EUASBESTOS

III. PROCESS/OPERATIONAL RESTRICTIONS – The facility is required to ensure that there are no fugitive asbestos emissions. The facility has opted to cover any asbestos-containing waste with at least six inches of compacted non-asbestos containing material once every 24 hours as allowed by the Asbestos NESHAP. Fencing is installed around the perimeter of the landfill as required by the Asbestos NESHAP. Asbestos warning sign installation on the fences is not required due to the implementation of the daily cover requirement of 40 CFR 61.154(c)(1).

IV. DESIGN/EQUIPMENT PARAMETERS – Gas collection devices are not installed in areas of the landfill where asbestos has been deposited in accordance with 40 CFR 60.759(a)(3)(l).

VI. MONITORING AND RECORDKEEPING – The facility is required to maintain waste shipment records consisting of the waste generator, the transporter, the quantity of asbestos containing material and the date of receipt. The facility is adequately documenting the information by maintaining a binder with a record of each waste shipment received. The facility is also required to maintain records of the location, depth, area, and quantity of asbestos containing material with the disposal site on a map or diagram. The facility has set up a grid within the landfill and the location of where the asbestos containing material is placed is recorded. The coordinates of the material location are determined using a GPS and that information is recorded as well. Log style records of the asbestos waste location, depth and quantity are included in the binder. Maps of the asbestos locations were not available for 2013 or 2014 but this information is available in the logs.

FGRULE290 – This flexible group is for emission units that are exempt from the requirements of Rule 201 pursuant to Rule 290. The facility currently has a groundwater remediation system in place that, in the facility's opinion, meets the requirements of Rule 290.

I. EMISSION LIMITS - Emissions from the remediation system are very low. By applying a worse case scenario and assuming that all of the contaminants are carcinogenic with an initial threshold screening level greater than or equal to 0.04 micrograms per cubic meter, the facility has demonstrated that the emissions are less than 20 pounds per month.

VI. MONITORING/RECORDKEEPING – In lieu of the burdensome recordkeeping format associated with Rule 290, the AQD has allowed the facility to use a worse case scenario (as previously mentioned in EMISSION LIMITS). The facility will monitor the flow rate of water and the concentration of the contaminants. As long as the flow rate and concentration are at or below the values used for the initial compliance demonstration, the facility can be considered in compliance with the emission limits. However, if the flow rate of water or the concentration of contaminants in the water increases, the facility will need to recalculate the emissions. Records provided by WM (attached) indicate that the remediation water flow rate and contaminant concentrations are less than the values used for the initial compliance demonstration (contaminants are non-detect).

FGCOLDCLEANERS

There is one cold cleaner on site that is a small parts cleaners serviced by an off site contractor. It appeared in good repair and the cover on it was closed. It was properly signed and the procedures for use of it and MSDS for the solvent also were posted. No odors were noted around the unit and housekeeping around it was good.

EXEMPT EQUIPMENT

In addition to the equipment addressed above there are several other pieces of equipment at the facility that are operated under Part 2 exemptions that should be noted. They are as follows:

- 2 landfill gas fired leachate evaporators.
- 1 landfill gas flare.
- 1 gasoline fired portable generator. A small cart style generator rated at 4kva max output used to operate electrical tools and a welder at various locations around the facility.
- 1 5.5 horsepower gasoline fired portable pump used to move accumulated water in containment, sump, and storm water basins.
- 1 20 horsepower gasoline fired portable pressure washer used to clean landfill operation equipment such as bulldozers. The pressure is mounted on a skid and is moved around the landfill as necessary.
- 1 diesel fuel fired pressure washer (no engine). The motor is electric but diesel fuel is used to fire the burner that heats the water. This unit is portable but is mainly used in the evaporator building.
- 1 waste oil fired space heater used to heat the maintenance building. Waste oil generated on site is used to fire the heater but it was unclear whether fuel was supplemented by additional oil from off-site. WM personnel were notified that if this were the case the heater would require a Permit to Install.
- Assorted tanks.

EVALUATION SUMMARY – Based upon the on-site inspection and records review, the AQD believes the facility is in compliance with ROP MI-ROP-N3261-2010, the Asbestos NESHAP, and 40 CFR 60 Subpart WWW.

NAME



DATE

6-1-15

SUPERVISOR

