

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

N326142223

<b>FACILITY:</b> GLEN'S SANITARY LANDFILL		<b>SRN / ID:</b> N3261
<b>LOCATION:</b> 518 E. TRAVERSE HIGHWAY, MAPLE CITY		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> MAPLE CITY		<b>COUNTY:</b> LEELANAU
<b>CONTACT:</b> Deb Johnston , Environmental Engineer		<b>ACTIVITY DATE:</b> 10/26/2017
<b>STAFF:</b> Kurt Childs	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> 2018 FCE Site inspection and records review.		
<b>RESOLVED COMPLAINTS:</b>		

**Full Compliance Evaluation 2018**

I inspected the Waste Management (WM) Glen's Landfill to determine compliance with ROP number MI-ROP-N3261-2015 and the Air Pollution Control rules. At the time of the inspection the weather conditions were: overcast, temp. 46, calm wind.

Prior to entering the facility, I observed that there were no odors outside of the facility. No odors were detected inside the facility during the inspection. Gas collection wells collect landfill gas for use in the leachate evaporator. Excess gas is directed to a flare. The evaporator was operating at the time of the inspection there was a water vapor plume but there were no visible emissions. The flare was not operating. Additional gas collection has been added to the new cell over the last year. The weather has been wet and the haul roads were well saturated, there was no fugitive dust. Most areas of this landfill have vegetative cover. 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. Leachate concentrate is recycled into the landfill and serves a dust control function in the active part of the landfill.

The ROP for this facility was renewed on 10/20/2015. 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. The facility has not exceeded that threshold, the most recent calculations for 2016 indicate the NMOC emission rate is 20.58 MG/yr. Therefore, only applicable permit conditions are addressed in this report.

**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 40 CFR 61 Subpart M, Asbestos NESHAP since it accepts asbestos containing materials.

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

**COMPLIANCE EVALUATION****SOURCE-WIDE CONDITIONS**

**IX. OTHER** – A fugitive dust plan is maintained and appears to be followed based on observations during the inspection.

**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 2 test was completed in December 2011. The next Tier 2 test is Due October 7, 2021.

**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)(I).

**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 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.

At the time of the inspection the dates of the waste shipments and the GPS log sheets did not match up due to the asbestos waste locations being marked by GPS several days after the shipment was received in several instances. The waste acceptance rate is low at this landfill and the cell does not fill up very fast but the recorded GPS locations of some shipments may not be exactly precise due to failing to mark the location at the time these waste shipments were received. I requested that Glen's Landfill review this issue and ensure the current locations are accurate and submit a plan to ensure asbestos waste locations are properly marked in the future. On November 7, 2017, I received confirmation that Waste Management has committed to reviewing this issue with employees and ensuring asbestos waste locations are properly documented in the future.

**FGRULE290** – This flexible group is for emission units that are exempt from the requirements of Rule 201 pursuant to Rule 290. This includes emissions from the evaporation of leachate (not fuel combustion) and Groundwater Remediation System. The Leachate system is exempt under Rule 285(aa). The groundwater remediation system has been shut down since contaminant levels have been non-detect. Monitoring continues and the remediation system could be restarted if necessary.


**I. EMISSION LIMITS** – There are currently no emissions from the remediation system. EUEVAPORATOR emissions are determined through annual calculations submitted with the MAERS report. NMOC emissions were below the 1000 lbs/mos. Uncontrolled emission rate required by Rule 290.

**VI. MONITORING/RECORDKEEPING** – The remediation system is not currently operating but records have been maintained in the past of the flow rate to the system and the HAP concentrations of the water. All HAPs were considered to be emitted for the purpose of the calculations. EUEVAPORATOR emission calculations are based on air flow, operating hours, landfill gas lower heating value (LHV) and MAERS emission factors.

**FGCOLDCLEANERS**

There is one cold cleaner on site that is a small mineral spirits parts cleaner with built in still to recycle the solvent that is serviced by Safety Kleen. It appeared in good repair and the cover on it was closed. No odors were noted around the unit and housekeeping around it was good.

**EVALUATION SUMMARY** – Based upon the on-site inspection and records review and inspection follow-up, the AQD believes the facility is currently in compliance with ROP MI-ROP-N3261-2015, the Asbestos NESHAP, and 40 CFR 60 Subpart WWW.

NAME  DATE 11-7-17 SUPERVISOR 