

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

N386232267

FACILITY: WEXFORD COUNTY LANDFILL		SRN / ID: N3862
LOCATION: 990 US 131 NORTH, MANTON		DISTRICT: Cadillac
CITY: MANTON		COUNTY: WEXFORD
CONTACT: Don Suchocki , Landfill Manager		ACTIVITY DATE: 11/18/2015
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	
SUBJECT: Scheduled inspection of this ROP source.		SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:		

Inspected this source as per ROP Number MI-ROP-N3862-2012. This ROP expires in September of 2017. Prior to entering the facility, it was noted that winds were light and out of the east. No odors were noted downwind of the facility.

This facility is subject to 40 CFR 60 Subpart WWW. Much of this subpart will not apply to a facility unless non-methane organic compound (NMOC) emissions are greater than 50 megagrams per year (Mg/yr). Compliance with this is determined through testing called Tier 2 testing. The last Tier 2 testing performed at this facility was in April of 2011, and indicated NMOC emissions of around 8.0 Mg/yr. Emissions reported to MAERS for 2013 were 5.5 Mg/yr. Consequently, much of Subpart WWW and the ROP conditions associated with it will not apply. Following are the findings of the inspection based on currently applicable conditions:

EULANDFILL<50 - This emission unit is of a landfill which has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters, but actual emissions based upon an established Tier 2 value in the landfill calculation, is less than 50 megagrams. This landfill also has received a volume expansion (increased the design capacity) permit from the DEQ, since May 30, 1991, and therefore making the landfill subject to NSPS, Subpart WWW.

I. - IV. No applicable conditions at this time.

V. TESTING/SAMPLING

The facility has chosen to perform Tier 2 testing and LandGem modelling as the method of compliance to demonstrate NMOC emissions. This testing was performed on April of 2011. Testing and modelling demonstrated that the facility is well below the 50 Mg per year NMOC emissions rate. The projected NMOC emission rate for this year is 11.34 Mg per year.

VI. MONITORING/RECORDKEEPING

The facility is required to keep a record of changes to their design capacity. The landfill has not undergone any expansions in the last 12 months and none are scheduled. The facility continuously monitors the waste taken in and the waste in place. Records of this were available and projections for it were included with the Tier 2 testing results. Also included were NMOC emissions projections which indicate the facility will never reach the 50 Mg/year NMOC threshold at current waste acceptance rates.

VII. REPORTING

The facility currently submits semi-annual and annual ROP reports, usually in a timely manner but recently received a VN for late reporting (see MACES). The facility also submits NMOC emissions data per the MAERS reporting system(see MACES).

VIII. STACK/VENT RESTRICTION(S) - NA

IX. OTHER REQUIREMENT(S)

The facility is required to install capture and control devices pursuant to 40 CFR 60, Subpart WWW should the NMOC emissions rate exceed 50 Mg per year. The latest testing indicates an NMOC emission rate of approximately 12 Mg per year and modelling indicates the 50 Mg per year threshold will not be exceeded at the current waste acceptance rate. While landfill gas collection and control is not required to be installed, the facility has installed it voluntarily.

EUASBESTOS - This emission unit represents any active or inactive area within the landfill which has accepted asbestos waste.

I. EMISSION LIMIT(S) - NA

II. MATERIAL LIMIT(S) - NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

This facility takes in asbestos waste as defined by 40 CFR 61. The procedure the facility selected and uses for acceptance of this waste is as follows:

- The waste generator must schedule delivery of the waste with the landfill no less than 24 hours ahead of time.
- Upon delivery, the waste is placed in a pre-surveyed area of the landfill and covered immediately.
- The location of the waste is then placed on a map.

The facility is secured and properly signed pursuant to the conditions of the ROP.

IV. DESIGN/EQUIPMENT PARAMETER(S)

The facility is not required to install gas collection in the landfill at this time but has installed it. The location of asbestos containing waste is mapped such that these areas can be avoided during gas collection construction. The facility does not currently segregate asbestos containing waste.

V. TESTING/SAMPLING - NA

VI. MONITORING/RECORDKEEPING

The facility is required to maintain the following information on a per shipment basis:

- i. The name, address, and telephone number of the waste generator.
- ii. The name, address, and telephone number of the transporter(s).
- iii. The quantity of the asbestos-containing waste material in cubic meters (cubic yards).
- iv. The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers.
- v. The date of the receipt.

A review of the records indicates this information is being kept for every shipment of asbestos containing material received. No discrepancies in this information were noted. As noted above, records of the location, nature, and quantity of each shipment were being kept. Also as noted above, any shipment received was covered immediately eliminating any chance of any friable material becoming airborne.

VII. REPORTING

The facility currently submits semi-annual and annual ROP reports, usually in a timely manner but recently received a VN for late reporting (see MACES). At no time in the last 12 months was any asbestos containing waste disturbed from its original placement, therefore no reporting was submitted to that effect.

VIII. STACK/VENT RESTRICTION(S) - NA

IX. OTHER REQUIREMENT(S) - NA

At the time of the inspection, this facility was in compliance with their air permitting.

FG-RULE290

This group consists only of an aeration pond (EUAERATIONPOND) which has not been used in the last 12 months, will not be used, and will be requested to be removed from the ROP upon renewal.

At the time of the inspection, this facility was in compliance with applicable air permitting.

NAME 

DATE 11/24/15

SUPERVISOR 