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

N386242408

FACILITY: WEXFORD COUNTY LANDFILL		**SRN / ID:** N3862
LOCATION: 990 US 131 NORTH, MANTON		**DISTRICT:** Cadillac
CITY: MANTON		**COUNTY:** WEXFORD
CONTACT: Vicki Garon , Engineer		**ACTIVITY DATE:** 11/06/2017
STAFF: Rob Dickman	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection of this major source		
RESOLVED COMPLAINTS:		

Wexford County Landfill is classified as a Type II sanitary landfill, also known as a Municipal Solid Waste (MSW) Landfill. The facility currently accepts petroleum contaminated soils, sludge, asbestos containing waste, municipal household waste, and other waste. The landfill received a volume expansion permit in April of 2000, and another in August of 2012. It has maximum design capacity of 3.45 million megagrams.

Landfill gas is collected at Wexford County Landfill by an active gas collection system. This system consists of vertical extraction wells that are installed in the depths of the landfill refuse and which remove landfill gas by vacuum that is applied to the well from the blower. The collected landfill gas is then routed to a flare for combustion. Since the NMOC emissions from the landfill have not yet reached 50 Megagrams as prescribed in NSPS 40 CFR 60, Subpart WWW, there are no operational requirements for the active gas collection system.

Additionally, a contaminated groundwater remediation system utilizing aeration ponds is currently in post-closure. Because of a monitoring requirement, it continues as an active emission unit. The facility also employs the use of a leachate evaporation system exempt from the requirement to obtain a Permit to Install pursuant to Rule 285(aa).

I performed an inspection at this landfill per ROP number MI-ROP-N3862-2017. No odors were noted downwind and outside of the facility. 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. An internal records review of the facility indicated no complaints received by the AQD in the last 12 months. Testing to determine Non-Methane Organic Compound (NMOC) emissions (Tier 2 testing) was performed in March of 2016. Following are the results of the inspection:

EULANDFILL<50 - This emission unit is the landfill. This landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters. Additionally, the landfill has received a volume expansion permit in April of 2000, and another in August of 2012. These two parameters make it subject to NSPS 40 CFR 60, Subpart WWW. NMOC emissions based on Tier 2 testing and LandGem modelling were determined to be less than 50 megagrams per year.

I. EMISSION LIMIT(S)

There are no emission limits associated with this emission unit.

II. MATERIAL LIMIT(S)

There are no material limits associated with this emission unit.

III. PROCESS/OPERATIONAL RESTRICTION(S)

There are no process or operational restrictions associated with this emission unit.

IV. DESIGN/EQUIPMENT PARAMETER(S)

There are no design or equipment parameters associated with this emission unit.

V. TESTING/SAMPLING

Tier 2 testing for annual NMOC emissions was last performed in March of 2016 and demonstrated emissions of 31.04 Mg for 2017. This testing was adequate to demonstrate NMOC emissions less than 50 Mg/yr therefore, further Tier testing is not required.

VI. MONITORING/RECORDKEEPING

The facility is required to keep on-site records of the design capacity report, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Records regarding this were reviewed on site and appeared complete and up to date.

The facility shall calculate the annual NMOC emission rate using the most recent version of USEPA's Landfill Gas Emissions Model (LandGEM). NMOC emissions based on LandGEM modelling and this testing were 31.04 Mg for 2017.

VII. REPORTING

All semi-annual and annual deviation reporting has been completed in a timely manner. Review of this reporting is documented in MACES.

The facility is required to submit an annual NMOC emission rate report to the District Supervisor. This emissions rate report is through the MAERS reporting system. This reporting has been performed annually and has been previously reviewed. Please see MACES for further details.

VIII. STACK/VENT RESTRICTION(S)

There are no stack parameters associated with this emission unit.

IX. OTHER REQUIREMENT(S)

If the NMOC emission rate is calculated to be equal to or greater than 50 megagrams per year, the facility is required to install a collection and control system. NMOC emissions based on LandGEM modelling and this testing were 31.04 Mg for 2017.

The facility is required to comply with all applicable provisions of 40 CFR Part 60 Subpart A and WWW, "Standard of Performance for Municipal Solid Waste Landfills", as they apply to the flare. This facility is in compliance with the Subpart.

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

I. EMISSION LIMIT(S)

There are no emission limits associated with this emission unit.

II. MATERIAL LIMIT(S)

There are no material limits associated with this emission unit.

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 has a form that each generator fills out prior to bringing this waste. Each form is assigned a job number. The waste is placed in a prepared location that has been previously marked by GPS. Upon

placement the waste is immediately covered to ensure no fugitive emissions from it. The job number is placed on a map of the facility at the surveyed location.

The facility is required to be secured and properly signed pursuant to the conditions of the ROP. The facility is fenced and well signed.

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

There are no testing parameters associated with this emission unit.

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)

There are no stack parameters associated with this emission unit.

IX. OTHER REQUIREMENT(S)

There are no other requirements associated with this emission unit.

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

NAME  DATE 11/21/17 SUPERVISOR