

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

N386252708

FACILITY: WEXFORD COUNTY LANDFILL		SRN / ID: N3862
LOCATION: 990 North Mackinaw Trail, MANTON		DISTRICT: Cadillac
CITY: MANTON		COUNTY: WEXFORD
CONTACT: Vicki Garon , Engineer		ACTIVITY DATE: 03/05/2020
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection of this ROP source.		
RESOLVED COMPLAINTS:		

Wexford County Landfill is classified as a Type II sanitary landfill, which is 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 where is it combusted.

Additionally, a contaminated groundwater remediation system utilizing aeration ponds is currently in post-closure. The facility has lined the pond for use with a leachate evaporation system but has never used the pond for this purpose. The evaporator system is exempt from the requirement to obtain a Permit to Install pursuant to Rule 285(aa). The pond will be removed from the Renewable Operating Permit (ROP) upon renewal in 2022.

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 (increased the design capacity) permit from the Department of Environmental Quality, since May 30, 1991. These two parameters make it subject to NSPS 40 CFR 60, Subpart WWW. Collected landfill gas is controlled by a sulfur removal system and flare.

Emissions Limits

There are no air emission limits associated with the landfill.

Material Limits

There are no material limits associated with the landfill.

Process or Operational Restrictions

There are no process or operational restrictions associated with the landfill.

Design or Equipment Parameters

There are no design or equipment parameters associated with the landfill.

Testing or Sampling

The facility has performed Tier 2 testing to determined annual NMOC emissions. Tier 2 testing was performed in April of 2016. NMOC emissions at that time were 31.04 Mg. Testing is due to be performed again in 2021. A review of this testing has been previously performed and documented by AQD staff.

Monitoring and 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. The current amount of waste in place is 5.4

million cubic yards. The current acceptance rate is 310,000 cubic yards per year. The design capacity for the facility has not changed since 2012 and is 3.45 million megagrams. 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). The facility has performed Tier 2 testing to determine annual NMOC emissions. Tier 2 testing was performed in April of 2016. NMOC emissions at that time were 31.04 Mg. Testing is due to be performed again in 2021. A review of this testing has been previously performed and documented by AQD staff.

Reporting

All semi-annual and annual deviation reporting has been reported, reviewed, and documented by AQD staff.

The facility is required to submit an annual NMOC emission rate report or 5-year estimate of the NMOC emission rate to the District Supervisor. This reporting has been performed and has been previously reviewed by AQD Staff.

The facility is required to notify the Department of any testing being performed at the facility per department guidelines. The only testing performed at the facility was completed in April of 2016. All required notifications were submitted in a timely manner.

Stack and Vent Restrictions

There are no stack restrictions associated with the landfill.

Other Requirements

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. As of the 2016 Tier 2 testing, the facility NMOC emissions were below this threshold and modelling indicates they continue to be.

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. This unit is subject to 40 CFR Part 61, Subparts A and M.

Emissions Limits

There are no air emission limits associated with this emission unit.

Material Limits

There are no material limits associated with this emission unit.

Process or Operational Restrictions

The facility must deter the general public from accessing an asbestos disposal site either through a natural or installed barrier. The rugged terrain, entry security, and relative remote location serve as adequate barriers to the public.

There are procedural options in Subpart M regarding how a facility handles asbestos waste, all of which are meant to minimize the possibility of human exposure. Following is the procedure this facility employs:

- A manifest for the material is supplied to the facility no earlier than 24 hours prior to arrival of the material.
- A designated, surveyed area away from the active working face is prepared for this waste.

- Upon acceptance, the waste is placed in the prepared area.
- It is covered with acceptable material as soon as practical, typically immediately upon placement.
- This location, which has been surveyed for latitude, longitude, and depth, is recorded on a map of the landfill such that it will not be accidentally disturbed during placement of gas collection and ventilation equipment.

This procedure is compliant with the Subpart.

Design or Equipment Parameters

The facility must ensure the no gas collection equipment placement disturbs and placed asbestos waste. As stated in this procedure above, placement of this waste is surveyed and mapped such that this possibility can be avoided.

Testing or Sampling

There are no testing or sampling procedures associated with this emission unit.

Monitoring and Recordkeeping

Manifests received at the facility are required to contain certain information including basic information on the generator, hauler, the type of waste it is, and how it is contained. A random review of two manifests (dated 5/24/19 and 2/14/20) indicted that these records are being completed correctly.

The facility is required to keep records of essentially any times they deviate from their procedures for handling asbestos waste including undocumented or unsecure waste, or disturbances of placed waste. There were no records indicating any time in the last 12 months where there was a deviation in their handling procedures.

Reporting

The facility is required to report any time they deviate from their procedures for handling asbestos waste. As indicated above, there were no records indicating any time in the last 12 months where there was a deviation in their handling procedures. Therefore, no reporting has been received.

Stack and Vent Restrictions

There are no stack or vent restrictions associated with this emission unit.

Other Requirements

The facility is required to comply with 40 CFR 61, Subparts A and H. By complying with the conditions listed in the EUASBESTOS section of the ROP, the facility is demonstrating compliance with the Subparts.

FG-RULE 290

Requirements in this table in the ROP are for the aeration pond. This pond had not been utilized in the last 12 months and will not be utilized as permitted in the future. The facility will request removal of it from the ROP upon renewal.

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

NAME



DATE

3/9/20

SUPERVISOR

