# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

#### **ACTIVITY REPORT: Scheduled Inspection**

FACILITY: Whitefeather Landfill		SRN / ID: N5985		
OCATION: 2401 E. Whitefeathe	r Road, PINCONNING	DISTRICT: Saginaw Bay		
ITY: PINCONNING		COUNTY: BAY		
CONTACT: Robb Moore , Environmental Manager (Sec 1)		ACTIVITY DATE: 09/03/2014		
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR		
SUBJECT:	•			
RESOLVED COMPLAINTS:				

I (glm) conducted an announced site inspection at the Whitefeather Landfill. Whitefeather Landfill is an existing Type II solid waste disposal facility owned and operated by Republic Services of Michigan with a gas to energy plant owned & operated by Granger Energy Services (P0437). No odor was noticed as I drove toward the landfill. I met with Republic Services of Michigan representatives Mr. Robb Moore, Environmental Manager and Mr. Jeff Tucker, General Manager. We toured the landfill and reviewed on site records required by air regulations and permits.

The landfill gas is collected at the Whitefeather (N5985) facility, which is a Type II, active municipal solid waste landfill (MSW). An active gas collection system removes landfill gas (LFG) by vacuum applied to the well from a blower. The LFG is then routed to the Granger facility for generation of electricity. Any excess LFG or when the Granger facility is down, the gas is routed to the open and enclosed flares owned and operated by Whitefeather Landfill. Whitefeather Landfill periodically modifies the gas well collection system and/or collection piping as needed when sections of the landfill begin to produce significant gas quantities.

The two companies have a contractual agreement in which Whitefeather Landfill sells landfill gas to Granger Electric of Pinconning and Granger is dependent upon Whitefeather Landfill to provide landfill gas which is combusted in its two internal combustion engines. The contractual and spatial relationship of the two facilities establishes Whitefeather Landfill and Granger Electric as a single stationary source based on the definition in Michigan's Rule 336.1119(r). However, based on an agreement between the AQD and management of Whitefeather Landfill and Granger, the two facilities were issued separate State Registration Numbers and ROPs in 2013.

Whitefeather Landfill was issued an ROP in November 2013. The source is subject to New Source Performance Standard (NSPS) for Municipal Solid Waste (MSW) Landfills, 40 CFR Part 60, Subpart WWW.

At the time of my inspection the landfill was just finishing up a gas project they had been working on throughout the summer. The facility moved the GCCS header, which was under waste, outside of the waste bounds. Additionally, the facility put in a new condensate pump. The contractors were shooting elevations when we drove by.

The following emissions were reported to the Michigan Air Emissions Reporting System in the 2013 submittal:

<u>Pollutant</u>	Amount (lbs)
CO	740.0
NMOC	3450.0
NOx	140.0
PM10, filterable	6940.0
PM10, primary	40.0
PM2.5, primary	40.0
SO2	40.0
VOC	4.0

I reviewed on site records for asbestos receiving and placement records, waste acceptance records, odor complaint, and, odor survey records. All required information was available and no violations were found during the inspection.

#### **EULANDFILL<50: Compliant**

The landfill began operation in 1991 and currently accepts municipal solid waste, non-hazardous special waste, regulated asbestos containing materials, and construction and demolition debris. The facility continues to expand and upgrade the site's GCCS. On June 30, 2010, Republic was granted an operating license that included a

construction expansion permit. The site now has 17.36 acres in final closure, 19.73 acres in interim closure, and 20.12 acres for current and future waste acceptance.

The Maximum Design Capacity is 4,561,753 megagrams per their March 2009 modified design capacity report. All the landfill gas collection equipment appeared to be properly maintained and operating. There was no LFG odor during the tour of the landfill. The facility does perform monthly GCCS monitoring and tuning to optimize gas collection.

The facility has authorization to recirculate leachate, though they do not currently utilize this option they have in the past.

I reviewed the waste acceptance logs for all waste types coming into the landfill. Each truck is weighed, material type recorded, and the information is entered in the facility's "TRUCK" database. The database provides the value for the annual volume of waste accepted which is used to calculate annual emissions that are reported to the AQD, Current filled volume as of April 2014 was 4,268,993 yd3.

The facility is required to conduct a NMOC emission test a minimum of once every five years. The last NMOC test was conducted on September 17, 2010. The NMOC concentration was found to be 142 ppmy-hexane. The next testing is required before September 17, 2015.

The site has a flare that previously controlled LFG. The LFG is now sent to the gas to energy plant but may be sent to the flare if needed. The flare's rated capacity is 1,200 scfm and the site's current flow is between 800-850 scfm.

#### **MAP/Odor Abatement**

On site Republic staff conducts routine monthly surveys. No off site odors were verified during their investigations. Mr. Moore asked if it was possible to change the monthly surveys to quarterly. At the time of my inspection I did not see an issue with it. After my inspection, DEQ received a PEAS call on September 11, 2015 at 8:52 AM regarding an odor nuisance from the facility. OWMRP staff responded to the complaint, see attached email. It is suggested to continue to perform odor surveys as currently detailed in the MAP.

#### **EUOPENFLARE**: Compliant

The facility has one open flare with a capacity of 1,200 scfm. The site maintains the open flare in a ready state. The flare is only used when engine maintenance is performed or during an unexpected shutdown. The GCCS has alarms if the engines are not available and auto start for the flares. The alarm is sent to a Granger employee who would investigate any alarm and then contact Mr. Tucker so that he may verify flare

At the time of the inspection all gas was directed to the engines and the flare was operating.

The 2013 MAERS reported a throughput flow to the open flare of 4.0083 MMCF landfill gas during a total 176 hours of operation.

#### **EUASBESTOS**: Compliant

We reviewed asbestos records and asbestos placement tracking. The facility maintains an asbestos placement log with generator and delivery information for asbestos containing waste accepted. The site uses a database program "TRUCKS" to record information as each load enters the landfill. A form is completed by on hill staff with the latitude, longitude, and depth of asbestos containing waste recorded. The asbestos placement form is kept with the manifest for the load. Copies of two completed "RACM Load Inspection Form" are attached. The facility had sent an asbestos notification to Lansing for disturbance of asbestos containing area in a landfill in March 2014. Mr. Moore said that he would send notification to the district office in addition to the asbestos program from now on. The District office received notification on September 5, 2014 from March 26, 2014 that had been sent to Lansing district with a cc to the Saginaw Bay District. The notification was not received in the SB District office.

#### **EUCOLDCLEANER**: Compliant

The facility has required instructions posted. Safety Kleen owns and manages the solvents and waste stream. Based on site records and Annual certification report the cold cleaner is in compliance.

At the time of the inspection the facility was found to be in compliance with the ROP (MI-ROP-N5985-2013) and the applicable air quality regulations.

NAME Shia R. Melan DATE 9/16/14 SUPERVISOR C. Harl



Fed Ex No.: 8753 9640 5887

March 26, 2014

NESHAP Asbestos Program
Michigan Department of Environmental Quality
Air Quality Division
Constitution Hall
525 West Allegan
Lansing, Michigan 48909

Subject: Notification of Excavation/Disturbance Asbestos Containing Waste

Whitefeather Landfill (ROP No. MI-ROP-N5985-2013)

Pinconning, Michigan

To Whom It May Concern:

Republic Services of Michigan IV, LLC (Republic) is submitting this notice of excavation of waste material at the Whitefeather Landfill as required by the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Asbestos being 40 CFR 61 Subpart M and Part 70 Operating Permit No: MI-ROP-N5985-2008a, Permit Condition EUASBESTOS/VII.6. The facility is required to notify the Michigan Department of Natural Resources & Environment, in writing, at least 45 days prior to excavation or otherwise disturbing any asbestos-containing waste material that has been deposited and is covered.

Beginning as early as May 19, 2014, Whitefeather Landfill plans to install several gas extraction wells and lateral piping as part of a landfill gas collection and control system expansion and upgrade. Whitefeather is making this notification in anticipation of performing this work through the end of September 2014.

During construction activities, asbestos-containing wastes may be encountered. Wastes encountered during the construction process will be temporarily stored at the location they were excavated. Excavated waste that is determined to contain asbestos materials will then be transported and disposed of in the active fill area that the Whitefeather Landfill designates for asbestos disposal. Waste material will also be covered during transport to the final disposal location. Any excavated waste or wastes from cutting and drilling activities that is determined to not contain asbestos materials will be disposed of in the daily active fill area.

As the waste excavated during the drilling process will likely be wet, potential for visible emission or airborne exposure will be minimal. The facility will cover the temporary storage container with a tarp and/or clean soils to assure that the waste remains wet or apply water as needed. Waste material will also be covered during transport to the final disposal location. Asbestos-containing materials will be disposed of at the designated asbestos disposal area portion of the landfill within 24 hours of disturbing the waste.

If you have any questions regarding this request or require additional information, please contact me at (810) 655-6906.

March 26, 2014 Page 2 of 2



Sincerely,

REPUBLIC SERVICES OF MICHIGAN IV, LLC

Robb Moore, P.E.

**Environmental Manager** 

Att: Notification of Intent to Renovate/Demolish

Cc: Saginaw Bay District - MDEQ Air Quality Division

Whitefeather Landfill Operating Record

## NOTIFICATION OF INTENT TO RENOVATE/DEMOLISH



ACM <u>cannot</u> remain in a structure, as it is likely to become regulated in the demolition/handling process.

It must be removed prior to demolition.)

D	<u>.</u>	MICHIGAN DEPA (MDEQ) AIR QUA NESHAP, 40 CF	ALITY DIVISIOI	N	ITAL QUALITY	LASA LEDGRE AND RESULTINGS GSTORE STORE ASSESSED VANDA		AFFAIRS (LA		OS PROGRAM,		
	DEQ/I	LARA USE ONL'	<u></u>				NT CONTRACT		-			
Postmark Date// Rec'd Date//  Emergency Date// Valid No				Name: N/A Mailing Address:								
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	11					Contact:		Ph				
		V UP/ nts:					ON CONTRACT		ernal Project #:			
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							Zíp:					
	Notifica	tion No		Trans No	<i>)</i>	E-mail:						
Calc	ulate LAR	A Asbestos Pro	lect Fee:		1% Project Fee)	Contact:		Ph	ione:			
		ost:	-	•	•	5. FACILITY	OWNER: ("Facil	ity" includes B	ridges)			
		ctor:					oublic Services o					
Lice	nsing Auth	ority:				1	dress: <u>2401 E. W</u>					
1. NOTIFICATION:				City/State/Zip: Pinconning, Michigan 48650  E-mail: Rmoore@republicservices.com								
Date of Notification: March 26, 2014				_	obb Moore		one: <u>810-655-</u> 6	906				
Date of Revision(s):							<u> </u>					
				6. FACILITY DESCRIPTION: Facility Name: Whitefeather Landfill								
Mark appropriate boxes: (both DEQ and LARA may apply):				Location Address/Description: 2401 E. Whitefeather Rd.								
		HAP) [260 In. ft./			old]	If Apt. # of units:						
<ul> <li>☐ Planned Renovation – 10 <u>working</u> days notice</li> <li>☐ Emergency Renovation</li> <li>☐ Scheduled Demolition – 10 <u>working</u> days notice</li> </ul>			City/Twp. Pinconning State: MI Zip Code: 48650									
			County: Bay Nearest Crossroad: M-13									
		ıal Burn – 10 <u>woı</u> Demolition	king days notic	ce		Size: (sq. ft.) No. of Floors: Floor No.:						
LARA (MIOSHA) [Will not accept annual notifications]  Demo, Reno, Encap. (>10 ln. ft./15 sq. ft.) 10 calendar days notice			Age: Present Use: Prior Use:  Specific Location(s) in Facility: Several locations within the waste mass									
		keno, Encap. (>14 ncy Renovation/E		.) 10 <u>calendar</u>	days notice	Opcomo 20	oution(s) in r usi	ity. <u>Octoral 1000</u>	nions within the w	0000 111003		
		SCHEDULE:				7. DISPOSAL						
		ST	START DATE END DATE		DATE	Name: Whi	tefeather Landfil					
*	Renovatio	n <u>N/A</u>		N/A		Location Address: 2401 E. Whitefeather Rd.						
+	Asb. Rem	oval <u>May 19,</u>	2014	September	30, 2014	City/State/2	Zip: Pinconning, I	Michigan 4865	60			
+	Demolition	n: <u>N/A</u>		<u>N/A</u>		8. WASTE TE	RANSPORTER 1	: v	VASTE TRANS	PORTER 2:		
	Encapsula	tion: N/A		N/A		1						
	Vork Sche		ndicate the anti-			Name: <u>N/A</u> Address:						
work hours for the purpose of scheduling a compliance inspection.		City/State/Zip:										
		=	of the Week		k Hours	Phone:						
	sb. Remov				- 6:30 P.M.		DEMOLITIONS					
	emolition:					"Ordered D notification	emolition.") A co	py of the offici	al Order must a	ccompany this		
	ncapsulati				Liliaina aka			oo: N/A				
		etup, build enclos <u>Ily</u> those dates yo					cy Ordering Den of Person Signir					
☐ Check here if this is a multi-phased project, attach a schedule showing the start/end date of each phase.			Name/Title of Person Signing Order:									
			Date of Order: Date Ordered to Begin:			gin:						
10.13	S ASBEST	OS PRESENT?	☐ Yes	□ No	☐ To be removed	d prior to demoliti		ACM not				
E	stimate th	e amount of asl	bestos: Include	RACM	RACM to be	RACM to be	Non-friable removed pri	ior to demo.				
(	Regulated	Asbestos Contair	ning Material) to	be	Removed	Encapsulated	Category I	Category II	Units of			
а	nd type (fid	ncapsulated, etc. oor tile, roofing, e	tc.) of non-friab	le Category					Ln. Ft.	☐ Ln. M.		
}	and/or Cat	egory II ACM tha	it <u>will</u> not be rer	moved prior					Sq. Ft.	☐ Sq. M.		
TO.	aemonio	n. (NOTE: In a d	emoniton, ceme	ะแลแบนร					Cu. Ft.*	☐ Cu.M.*		

Cu. Ft.\* Cu.M.\* \*Volume (cubic ft./meters) should be used only if unable to measure by linear/square measure (example: asbestos has fallen off of surface).

# NOTIFICATION OF INTENT TO RENOVATE/DEMOLISH (continued)

11.	PROJECT DESCRIPTION: Complete A) for Renovation	(asbestos removal/enc	apsulation) and/or B)	for Demolitio	n:			
	A) RENOVATION: Mark all surfaces/types of RACM to be Piping Fittings Boiler(s) Tank Beam(s) Duct(s) Tunnel(s) Ceilli Mag Block Other (describe)  Method of removal: Describe how the asbestos will be	s(s) ng Tile(s)	☐ Beam(s) ☐ ☐ Other (describe	Fittings   Duct(s) 	☐ Boiler(s) ☐ Tunnel(s)	☐ Tank(s) ☐ Ceiling Tile(s)		
	6 W							
	B) DEMOLITION: Describe the method of demolition of fa	cility, bridge, etc., and i	ndicate if complete o	r partial. If par	tial, describe whic	ch part of facility		
	bridge, etc., will be demolished: See Attached Letter. F	leader and lateral pipin	g will be installed in	the existing wa	ste mass.			
12.	ENGINEERING CONTROLS: Describe work practices an until proper disposal: Material will be wet down as necessal.							
	a tarp and/or clean soils to assure the waste remains wet.							
13.	UNEXPECTED ASBESTOS: Describe the steps you into becomes friable (crumbled, pulverized, reduced to powder, A licensed asbestos abatement contractor will be contacted.	etc.) and therefore re-	ent that unexpected gulated: <u>All activities</u>	RACM is four will stop and t	nd or previously r he suspect mater	non-friable asbestos ial will be wet down.		
14.	PROCEDURE(S) USED TO DETECT THE PRESENCE C analytical sampling was used, describe method of analysis a renovation/demolition notification.): A review of site location	. (The determination of	f the presence or ab	sence of asbes	stos must be mad	e prior to submitting		
	potentially containing asbestos (RACM)							
	B) Name, address, and phone number of company performing asbestos survey: N/A							
	C) Name, accreditation number of inspector, and date of in	spection: N/A						
15.	EMERGENCY RENOVATIONS: Date/time of emergency:	N/A	Describe the s	udden, unexpe	ected event:			
	Explain how the event caused unsafe conditions, and/or wo	uld cause equipment o	lamage and/or an un	reasonable fin	ancial burden:			
16.	6. I certify that an individual trained in the provisions of 40 CFR Part 61, Subpart M, will be on-site during the renovation and during demolition involving RACM above the threshold and/or during an ordered demolition. Evidence that this person has completed the required training will be available for inspection at the renovation or demolition site.							
	N/A					N/A		
	Signature of Owner or Abatement Contractor Date	Signa	ture of Owner or Dei	nolition Contra	ctor	Date		
17.	Signature Requirements for Projects with Ne Per Section 221(1)(2) of P.A. 135 of 1986, as amended linear feet/15 square feet or more of friable material with have been advised by the contractor of my responsibility.	egative Pressure , clearance air monit nich is performed wit ty under Act 135 to h	Enclosures: (re oring is required fo hin a negative pres ave clearance air m	quired by L or any asbest sure enclosu onitoring peri	ARA) os abatement pi re. I (the building ormed on this pi			
	Signature of Building Owner or Lessee Date	 Siana	ture of Asbestos Aba	atement Contra	ctor Representati	<u>N/A</u> ve Date		
	NOTE: It is not mandatory that a signed copy be sent to LARA							
	and made part of your records before the project begins.							
18.	I certify that the above information is correct	<b>!:</b>						
	Robb Moore 3/26/							
	Printed Name of Owner/Operator Date	Signa	ture of Owner/Opera	tor		Date		
MAI	LING ADDRESSES/PHONE NUMBERS: (See Item 1	to determine which ag	ency requirements/re	egulations are	applicable to your	project.)		
For	Public Act 135 of 1986, as amended, Section 220	For NESHAP De	nolitions/Renovat	ions, 40 Cf	R, Part 61,	Subpart M. mail		
	or (8), mail to address below. For more info visit:	notifications to the	appropriate address michigan.gov/deq o	below (by co	ounty of subject	facility): For more		
		INIO AISII UIIDAWWW	HILL HOUSE CHARLES IN			SHAP Program 🗀		
	//www.michigan.gov/asbestos	All Counties (exce			yne County Or	1 8		
http:		All Counties (excented NESHAP Asbestos	ept Wayne Count	<u>V)</u> <u>Wa</u> NE	yne County Or SHAP Asbestos	n <mark>ly</mark> s Program		
MIO LAR	//www.michigan.gov/asbestos	All Counties (exce	ept Wayne Count Program	<u>y) Wa</u> NE Dei	yne County Or	nly s Program , DEQ, AQD		

517.322.1320 (office), 517.322.1713 (fax)

Lansing, MI 48909-8171

EQP5661 (rev. 04/11)

Lansing, MI 48909-7760

517.241.7463 (Office) 517.373.7064 (Revision Line)

3058 West Grand Boulevard Detroit, MI 48202

313.456.4686

### McCann, Gina (DEQ)

From:

Burke, Brian (DEQ)

Sent:

Friday, September 12, 2014 1:37 PM

To:

Hare, Chris (DEQ); Brewer, Kathy (DEQ); McCann, Gina (DEQ)

Cc:

Schwerin, Gary (DEQ); Roycraft, Phil (DEQ)

Subject:

FW: PEAS incident notification - 1st Attempt Saginaw Bay

I responded to this PEAS complaint yesterday. Attached is my complaint write up.

Staff inspected the area surrounding the landfill around 3 p.m. on 9-11-14. There were no odors detected at Mr. Reeves home or along Bay Arenac Road. Staff did observe some slight landfill garbage orders along Whitefeather Road, south of the landfill. The wind was coming from the north. Staff inspected the landfill and discussed the complaint with landfill staff. Landfill staff stated that they have been working on a new landfill gas collection line and new gas collection wells during the past few weeks. They said that they have excavated into some waste areas on and off over the last week. The project also resulted in the gas plant being shut off from time to time. The project was expected to be completed by the end of the day on 9-12-14. Landfill staff was advised to complete the project and increase the amount and frequency of application of daily cover on the incoming solid waste. Staff spoke with Mr. Reeves on 9-12-14 and explained the results of their inspection and asked him to notify the DEQ of any continuing odor issues at the landfill. Complaint is considered closed.

Let me know of you have any questions. Brian.

Brian Burke
Environmental Quality Analyst
Office of Waste Management and Radiological Protection
Saginaw Bay District Office
989-894-6293
989-891-9213 (fax)
burkeb@michigan.gov

From: e@ambs.info [mailto:e@ambscallcenter.com] Sent: Thursday, September 11, 2014 9:03 AM

To: DEQ-PEAS-SaginawBay

Subject: PEAS incident notification - 1st Attempt Saginaw Bay

IN: 2014-09-11 08:52 am NSJ

PEAS Incident Number:

20140911-090209

Call Type: Take Report

Current Date:

2014-09-11 Time:

08:52:18 Day:

THURSDAY Agent:

NSJ

Status: OFFICE HOURS ISTime: TRUE IsDay: TRUE

District Office:

Saginaw Bay

Description of Incident, include injuries, fatalities, evacuations:

Bad Smell Coming From The Landfill, Has Been Getting Worse.

Complainant Name: Don Reeves

Complainant Co Name:

Complainant Address: 3425 Bay Arenac Rd

Complainant City: Pinconning Complainant State: MI

Complainant Phone: (989)714-9966 Complainant Phone(alt): (989)846-9322

Party Involved - Contact Name: Party Involved Company: Republic Landfill Party Involved Street Address: N/a Party Involved City: Pinconning Party Involved State: MI Incident Location Str address: 3425 Bay Arenac Rd Incident Cross Streets: Armstrong And State Incident City or Township : Pinconning Township Incident County: Bay , District Saginaw Bay Occurred Date: Occurred Time: 05:00 PM 09/05/2014 Yes Incident Ongoing: Name of Body of Water, Drain or Ditch Involved: Unsure Name of Pollutant: Unknown Quantity Released to Water: Unsure Quantity Released to Ground: Unsure Amount Released to Air: Unsure Cleanup Contractor Name: Unsure Release Secured: Unsure DISPATCHER (control-M) M-F 8a-5p(except Holidays-Select District SAGINAW Initials of Agent Giving call back: Given to: Date given to on call: Time given to on call: \*\*\*\*\* ACTIVITIES \*\*\*\*\* REVERSE SAVE 09/11/2014 09:00:00 am AGT: NSJ AUTO SCRIPT M-F 8a-5p 09/11/2014 09:00:00 am AGT: NSJ SMS Submit:Bruce VanOttern 09/11/2014 09:00:00 am AGT: \*SM SMS OK:Bruce VanOttern 5173885428 09/11/2014 09:00:00 am AGT: \*SM SMS Submit:NOTIFIED. Addr 5173885428 09/11/2014 09:00:00 am AGT: \*SM EMAIL OK: email, vanotterenb@michigan.gov 09/11/2014 09:00:00 am AGT: \*EM Auto ended 09/11/2014 09:01:00 am AGT: DNX DIT 09/11/2014 09:03:00 am AGT: DNX Email 09/11/2014 09:03:00 am AGT: DNX

>>>>>> END OF ALL FORMS <

>>>>>> END OF FORM <<<<<<