DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N602473343

FACILITY: Huron Landfill Corporation		**SRN / ID:** N6024
LOCATION: 4151 S MCMILLAN RD, BAD AXE		**DISTRICT:** Bay City
CITY: BAD AXE		**COUNTY:** HURON
CONTACT: Rachel Thompson , Site Engineer		**ACTIVITY DATE:** 08/28/2024
STAFF: Adam Shaffer	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: On-site inspection.		
RESOLVED COMPLAINTS:		

A full compliance evaluation (FCE) was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Huron Landfill Corporation (HLC) site located in Bad Axe, Michigan. Applicable records were requested on August 22, 2024, to verify compliance with Renewable Operating Permit (ROP) No. MI-ROP-A6024-2024. An in-person inspection to verify onsite compliance was later completed on August 28, 2024.

Facility Description

HLC is a Type II municipal solid waste landfill. The facility is a major source for volatile organic compounds (VOCs) and is in operation under ROP No. MI-ROP-N6024-2024. The facility is subject to the following federal regulations.

- 40 CFR Part 60, Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014
- 40 CFR Part 63, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
- 40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Dispensing Facilities

Offsite Compliance Review

Based on the timing of the inspection, HLC had already submitted their State and Local Emissions Inventory System (SLEIS) Report for 2023 and had appeared acceptable.

Per the NSPS Subpart XXX, HLC submitted their Design Capacity and Non-Methane Organic Compound (NMOC) Emission Rate Report, in November 2022, to the AQD. The report included the results after using the default NMOC concentration to show the NMOC generation. The results showed that the NMOC generation exceeded the 34 Mg/yr limit, thus HLC would be completing Tier 2 testing to determine a site specific NMOC concentration value.

HLC completed Tier 2 testing in March 2023, to collect data to determine the site specific NMOC concentration value that would then be used to calculate the NMOC generation value and verify if less than the 34 Mg/yr limit. Test report results showed a calculated NMOC generation value of 27.1 Mg/yr for 2023. The test results appeared acceptable, and HLC at this time is not required to install a gas collection system.

HLC submitted the Annual NMOC Emission Rate Report for 2024, to the AQD in May 2024. The NMOC generation value for 2024 was 27.18 Mg/yr which is acceptable. Other aspects of the report included a history of site activities, future activities and projected future NMOC generation values for several years.

Compliance Evaluation

A request was sent to Ms. Rachel Thompson PE, Site Engineer for Emterra Environmental USA, on August 22, 2024, for records required by ROP No. MI-ROP-N6024-2024. The onsite inspection was completed on August 28, 2024. AQD staff AS, Haley Willman (HW) and Emily Crimmins (EC) arrived in the area of the facility at approximately 8:36am. Weather conditions at the time of the inspection were temperatures in the low 70's degrees Fahrenheit, winds to the south / southeast at 5-15 mph and cloudy skies. Prior to entering the facility, offsite observations were conducted. No opacity emissions were noted, and process odors were identified along the northern edge of the facility. This site does not have a history of odor complaints and at this time no further action is necessary. Upon arriving onsite, AQD staff met with Ms. Rachel Thompson and Mr. John Walker, Operations Manager of HLC, who provided a tour of the site and answered site specific questions. Records were provided by Ms. Rachel Thompson.

As mentioned above HLC is a Type II municipal solid waste landfill. During the inspection, various components pertaining to site operations were discussed at length with company staff.

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EUASBESTOS

This landfill is actively accepting or has accepted asbestos waste in the past.

Onsite Observations

Per Special Condition (SC) III.1, if the landfill accepts asbestos-containing waste materials from a source covered under 40 CFR 61.149, 40 CFR 61.150 or 40 CFR 61.155, the permittee shall meet operational requirements further described in this condition. During the course of the inspection, how HLC accepts waste was discussed at length. HLC is given a 24 hr advance notice by waste submitters that they have asbestos containing materials (ACM), which allows HLC time to prepare a location. Once the waste is weighed it is placed in a pre-dug area and covered over with at least six inches of non-ACM. Since any ACM is covered, visible emission requirements per this condition would not appear to be a concern and would meet the requirements of SC III.1.c. Based on observations made at the time of the inspection, proper barriers appeared to be in place per SC III.1.b.

Records Review

Per SC VI.1a, for all asbestos-containing waste material received, the permittee of the active waste disposal site shall keep various record specifics further described in this condition. Records were requested and provided for several recent shipments received of ACM. Upon review of the records provided and follow up with company staff on specifics, it appears that HLC is keeping track of applicable records.

Per SC VI.1c, upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity received, HLC shall attempt to reconcile the discrepancy with the waste generator. Select time periods were reviewed to see if there have been any discrepancies. In the time periods reviewed there appeared to be no discrepancies.

Per SC VI.2, the permittee shall maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of ACM material within the disposal site on a map or diagram of the disposal area storage. A map was requested and provided of the locations at the landfill of ACM. Staff explained that when they accept ACM, they dig a hole approximately 5-10 feet deep and bury the material with municipal solid waste. Additionally, as mentioned above the ACM is covered with at least 6 inches of non-ACM material at the end of the working day as required per SC III.1c. It was noted upon review that the area dimensions of the hole dug for each location of ACM materials was not being kept track of. This was discussed with the company and moving forward would be corrected. Based on the records / responses provided by company staff, HLC appears to be keeping track of the remaining applicable items.

Per SC VI.3, based on a response back from company staff, there appears to be no asbestos-containing or non-degradable waste excluded from collection.

Per SC VI.4, the permittee shall keep records of one of the following further described in this SC regarding any active disposal sites where ACM have been deposited. HLC appears to be following SC VI.4.b, which requires keeping records of the date asbestos waste is received, the amount and type of material that has been used to cover the asbestos waste, and documentation that the cover material was applied in the frequency required in SC III.1.c of this table. It was noted that HLC does not keep track of the amount of waste used to cover the ACM, but the layer of materials placed over the ACM is consistently at least six inches as required and completed by the end of the working day. Moving forward, HLC shall keep track of the amount of waste used to cover ACM materials. No additional concerns were noted with items being kept for this condition.

Flexible Group (FG)LANDFILL-AAA<50 / FGLANDFILL-XXX<34

This flexible group is for the Municipal Solid Waste (MSW) landfill that commenced construction, reconstruction, or modification after July 17, 2014, and that has accepted waste at any time since November 8, 1987.The MSW landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters, and actual NMOC emissions less than 34 / 50 megagrams per year respectively. This MSW landfill is subject to the requirements of 40 CFR Part 60, Subpart XXX and 40 CFR Part 63, Subpart AAAA.

Records Review

The permittee must maintain up-to-date and readily accessible, items such as the design capacity report that triggered 40 CFR 63.1959(b), current amount of waste in place and year by year waste acceptance rate. Various records were reviewed onsite and provided following the inspection. For 2023, 75,080.04 tons of waste were reported disposed of. As of August 31, 2024, 72,738.18 tons of waste were reported for 2024. Based on the records reviewed at the time of the inspection and follow up with company staff, HLC appears to adequately be keeping track of applicable records.

FGGASDISPENSING

This flexible group specifies requirements for a gasoline dispensing facility (GDF) that is subject to 40 CFR Part 63 Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Gasoline Dispensing Facilities. This flexible group includes existing stationary GDF equipment that was constructed before November 9, 2006, and that have a monthly gasoline throughput less than 10,000 gallons

and is located at an area source of hazardous air pollutants. The affected source includes each gasoline cargo tank during the delivery of product to the GDF and includes each storage tank that dispenses gasoline into the fuel tank of a motor vehicle.

It appears that the GDF for this site consists of one 300-gallon gasoline tank. The tank was observed during the course of the inspection.

Per SC III.2, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken are further described in this special condition. As stated above the one 300-gallon gasoline tank subject to this NESHAP was observed during the course of the inspection. A secondary containment was noted around the tank. The tank appeared to be in good condition and no excessive staining was noted of recent spills. Company staff stated that since the issuance of this ROP there have been no spills associated with this tank.

HLC is required to keep track of monthly throughput records per SC VI.1. Records were reviewed for select time periods at the time of the inspection. Based on the records reviewed, the tank is refilled approximately once every other month which is well within the 10,000-gallon threshold. Per the NESHAP Subpart CCCCCC, since the GDF has a monthly throughput of less than 10,000 gallons, HLC is to follow the requirements of 40 CFR 63.11116, which does not require having a submerged fill pipe for the tank.

Per SC VII.1, the permittee shall submit an initial notification that HLC is subject to this subpart by May 8, 2008, or no later than 120 days after the facility becomes subject to the NESHAP Subpart CCCCCC or at the time the facility becomes subject to the control requirements in 40 CFR 63.11117, unless the facility meets the requirements in SC VII.6. Upon review of the NESHAP Subpart CCCCCC, this condition would apply to GDF's that are subject to 40 CFR 63.11117 (having a monthly throughput of 10,000 gallons or more). The requirements of 40 CFR 63.11116, which apply to HLC, do not require the submittal of an initial notification. No further action is necessary at this time. In the future if the monthly throughput increases and the conditions of 40 CFR 63.1117 become applicable, then an initial notification may need to be submitted.

Additional Observations

The bulk of waste that HLC receives is municipal solid waste and alternative cover materials. HLC keeps track of the amount of waste received each year by weighing waste brought onsite. A scale was noted along the western entrance to the landfill. Additionally, the facility completes annual aerial surveys of the site that also help in determining the amount of waste received.

Emterra Environmental USA, the owner of HLC, owns the fleet of vehicles used to collect waste for the site. Additionally, there is a residential drop off area that accounts for a very small percentage of waste received.

During the course of the inspection around the landfill, the current construction of Cell 1B was observed. It appears that Cell 1A had finished being constructed in 2022.

Three passive vent flares were noted in operation at the time of the inspection. The flares are connected to the primary leachate pipe for Cells C, E and F respectively. Each flare has a system that will continuously spark and if enough methane is being vented will ignite. The flare for Cell C was observed occasionally lighting methane. The flares for Cells E and F

were not venting enough methane to vent but the spark system could be heard trying to light. Daily checks are done for all three flares to make sure are operating properly. Based on the observations made, the three flares appear to be being operated in a satisfactory manner.

No excessive litter or ponding was noted during the course of the inspection. The site had recently experienced severe weather which appeared to account for standing water noted.

One parts washer was noted during the course of the site inspection. The parts washer uses a degreaser / water to clean items and is heated. The parts washer appears to be exempt per Rule 281(2)(h).

During the course of the inspection, there appears to recently have been a methane exceedance on a gas monitoring well. The suspected cause appears to be the Act 87 Area to the east of HLC. HLC has installed several vents to attempt to remove the methane emissions.

Conclusion

Based on the observations made and records reviewed, HLC appears to be in compliance with MI-ROP-N6024-2024 and applicable air pollution control rules.

NAME _____ DATE 09/16/2024 SUPERVISOR _____