

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

N602863649

<b>FACILITY:</b> GFLNorth Michigan Landfill - Elk Run		<b>SRN / ID:</b> N6028
<b>LOCATION:</b> 20667 5 MILE HWY, ONAWAY		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> ONAWAY		<b>COUNTY:</b> PRESQUE ISLE
<b>CONTACT:</b> Chris Gee , General Manager		<b>ACTIVITY DATE:</b> 07/14/2022
<b>STAFF:</b> Rob Dickman	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Scheduled inspection of this major source.		
<b>RESOLVED COMPLAINTS:</b>		

GFL North Michigan Landfill is a Type II Sanitary Landfill, with a design capacity of 2.7 million cubic meters. It is located approximately five miles south of the town of Onaway in Presque Isle County. Land around the facility is mostly rolling hills. Land use within a mile of the facility is a mix of agricultural and forest lands and is sparsely populated with some residential homes. The nearest resident is approximately 200 yards due west of the entrance to the facility.

The facility accepts municipal solid waste (MSW), inert wastes, and a minimal amount of asbestos containing waste. The MSW is transported to the facility to an area (cell) where it is deposited on the working surface. The deposited waste is covered with soil daily. When a cell reaches its design capacity, a liner is installed to cover the waste. Over time, the waste decomposes producing landfill gas (LFG). The LFG is comprised of methane, carbon dioxide, carbon monoxide, and volatile organic compounds (VOCs). MSW initially undergoes aerobic microbial activity producing predominately nitrogen gas and carbon dioxide. As oxygen levels decline, gas composition changes to a mixture of methane and carbon dioxide. LFG typically contains a small percentage of non-methane organic compounds (NMOC). The NMOC fraction consists of various organic hazardous air pollutants (HAPs), greenhouse gases, and volatile organic compounds (VOCs). The facility received a Solid Waste Disposal Area Construction Permit to increase the landfill's design capacity on June 18, 2001.

This facility is currently subject to the following federal standards:

- Emission Guidelines for existing Municipal Solid Waste Landfills promulgated under 40 CFR 60, Subparts A and Cf
- Federal Plan Requirements for Existing Municipal Solid Waste Landfills promulgated in 40 CFR 62, Subpart OOO. This Federal Plan will apply until a State Plan is approved or delegation of the Federal Plan is approved.
- National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos promulgated in 40 CFR 611, Subparts A and M

The facility Renewable Operating Permit (ROP) number MI-ROP-N6028-2019 will be modified upon renewal to reflect these requirements.

The landfill is required to calculate the non-methane organic compound (NMOC) emission rate and submit non-methane organic compound (NMOC) emission rate reports. The purpose of these reports is to determine whether the facility is required to install an active Gas Collection and Control System (GCCS). To require a GCCS under 40 CFR 62 Subpart OOO, the annual NMOC emission rate must exceed 34 megagrams (Mg). Once the NMOC estimated emission rate exceeds 34 Mg per year, the Landfill will have 12 months to submit a landfill GCCS design plan. In July of 2018 GFL North Michigan Landfill provided NMOC estimates which demonstrated that NMOC emissions would not exceed 34 Mg per year in the next five years. However, the facility has voluntarily installed a GCCS. This system will come online in August of 2022.

I performed an inspection at this facility to determine GFL Northern Michigan Landfill's compliance with the abovementioned requirements and the requirements of ROP number MI-ROP-N6028-2019. Following are the findings of this inspection.

**EULANDFILL** - 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. A GCCS was installed voluntarily and will come online in August of 2022. It will be controlled by a flare.

#### **Emissions Limits**

NA

**Material Limits**

NA

**Process or Operational Restrictions**

NA

**Design or Equipment Parameters**

NA

**Testing or Sampling**

The facility has performed Tier 2 testing to determine annual NMOC emissions. Tier 2 testing was performed in May of 2018. NMOC emissions at that time were 8.5 Mg per year and were modelled to be 13.28 Mg for 2022. A review of this testing has been previously performed and documented by AQD staff.

**Monitoring and Recordkeeping**

The facility is required to maintain a copy of their design capacity report which details how much waste the facility has room to accept along with records of any planned expansions. The most recent copy of this is dated January of 2018. It delineated that, due to a waste density change, the facility exceeded the 2.5 million megagram capacity threshold to be subject to federal standards. The revised calculated capacity of the landfill is 2.7 million megagrams. No planned expansions were associated with this change and no expansions have been made to the landfill.

A current record of the amount of solid waste in-place and year-to-year waste acceptance rate is required to be kept. The waste in-place for 2022 is listed at 1,779,997 Mg based on LandGem Modelling. The waste acceptance rate for 2021 was calculated by the facility at 107,068 Mg/yr.

The facility is required to calculate annual NMOC emissions, or a five-year estimate of emissions based on modelling. For the year 2022, NMOC emissions were estimated to be 13.28 Mg.

**Reporting**

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

The facility is required to submit annual NMOC emissions, or a five-year estimate of emissions based on modelling. For the year 2022, NMOC emissions were estimated to be 13.28 Mg.

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 May of 2018. All required notifications were submitted in a timely manner.

**Stack and Vent Restrictions**

NA

**Other Requirements**

NA

**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. It should be noted that all asbestos waste that was manifested and brought to the landfill in the last 12 months was transported there by GFL only. However, the facility will accept this type of waste from third party contractors.

**Emissions Limits**

NA

**Material Limits**

NA

**Process or Operational Restrictions**

The facility must deter the general public from accessing an asbestos disposal site either through a natural or installed barrier. This facility is in a very rural location at the end of a dead-end road. Surrounding the facility is a six-foot fence with triple barbed wire on top. Additionally, 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. During disposal, the active working face is shut down.
- The waste is inspected at the gate to ensure it was represented accurately on the manifest for it. 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 and ROP.

**Design or Equipment Parameters**

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

**Testing or Sampling**

NA

**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. The rate this facility receives asbestos containing material is infrequent. A random review of two manifests (dated 1/6/22, and 5/5/22) indicted that these records are being completed correctly. As of the date of the inspection, approximately 5 loads of material had been received for a total of 86 yards in 2022.

Mapping for all asbestos waste is performed using GPS. The coordinates are logged on to the map, including depth.

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 M. By complying with the conditions listed in the EUASBESTOS section of the ROP, the facility is demonstrating compliance with the Subparts.

It was noted during the final compliance evaluation that the second half deviation report and annual report for 2021 had not been logged in to MACES. A copy of this reporting was requested and was received on August 4, 2022. The reporting was signed and dated 3/9/22 and would have been due 3/15/22. A review of this reporting was performed and no deviations were noted which is typical for this source. It is undetermined if the facility submitted this report on the date of the reporting. The facility has no history of absent or late reporting. As no deviations were reported, no further action on this matter is recommended.

No other compliance issues were noted.

NAME  DATE \_\_\_\_\_ SUPERVISOR \_\_\_\_\_