

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

N603933123

FACILITY: K & W LANDFILL INC		SRN / ID: N6039
LOCATION: 11877 HIGHWAY M-38, ONTONAGON		DISTRICT: Upper Peninsula
CITY: ONTONAGON		COUNTY: ONTONAGON
CONTACT: ROBERT J PLISKA , REGIONAL ENGINEER		ACTIVITY DATE: 01/12/2016
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced inspection to determine compliance with MI-ROP-N6039-2012.		
RESOLVED COMPLAINTS:		

**FACILITY:** K&W Landfill Inc (MI-ROP-N6039-2012)

**INSPECTION DATE:** 1/12/2016 & 2/04/2016

**MDEQ-AQD STAFF:**

- Joseph Scanlan, EQA

**FACILITY REPRESENTATIVE:**

- Shawn Taisto, Landfill Operations Manager, Waste Management

**LOCATION:**

K&W Landfill (K&W) is located in Ontonagon County, approximately 1 mile west of the unincorporated village of Greenland. The surrounding area is rural.

**SUMMARY OF OPERATIONS:**

K&W is a Type II municipal solid waste landfill that has been accepting municipal and asbestos waste since 1988 and is owned and operated by Waste Management (WM). The landfill also operates a small parts washer and a leachate storage tank. This landfill does not operate a landfill gas collection system, however there is a leachate collection system in place. It should be noted that no official odor complaints have been taken regarding this facility in the last twelve months.

It should also be noted that the majority of ROP permit conditions associated with this facility only apply once the facility has reached a non-methane organic carbon (NMOC) emissions threshold of 50 Megagrams per year based on testing and modelling through the LandGem program. As per their last testing performed in 2010, the facility has not exceeded that threshold. Therefore, only applicable permit conditions of MI-ROP-N6039-2012 are addressed in this report.

**REGULATORY APPLICABILITY:**

The stationary source is located in Ontonagan County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

Because K&W (EULANDFILL) exceeds NSPS design capacity limits they are required to operate under an ROP which addresses non-methane organic carbon (NMOC) emission rates, asbestos-containing waste (EUASBESTOS), a small parts washer (FGCOLDCLEANERS), leachate storage tank, and fugitive dust plan. No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451.

EULANDFILL has received a volume expansion permit for increased design capacity from the DEQ since May 30, 1991 therefore making the landfill subject to NSPS WWW. Any municipal solid waste landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters is subject to the requirements of Rule 336.1210 to obtain and only operate in compliance with an ROP. R336.1212 Subpart (3)(f) exempts landfills, associated flares, and leachate collection and handling equipment from inclusion into the ROP with exception of applicable requirements under 40 CFR Part 60, Subparts Cc and WWW—which require the source to calculate an NMOC emission rate for the landfill. Due to NMOC emission rates of less than 50 Mg/year, K&W is not required to implement a landfill gas collection/control system.

Asbestos waste (EUASBESTOS) is accepted at K&W and is regulated under 40 CFR Rule 61, Subparts 154(c) and 154(i) through (j), *Standards for Active Waste Disposal Sites*.

MI-ROP-N6039-2012 contains one flexible group (FGCOLDCLEANERS) which covers existing and future exempt cold cleaners, regulated by Act 451, Rule 611/707. The small cold cleaner parts washer has been retired and a new parts washer utilizing an aqueous-based solvent has been installed. This former emission unit has been dismantled and placed in a locked enclosure and is to be removed from the site. It is expected that flexible group FGCOLD CLEANERS will be removed from the ROP in the upcoming ROP renewal process in 2016.

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

#### INSPECTION

PPE worn during facility visits included steel-toed boots, safety vest, safety glasses and hardhat.

On 1/12/2016 I conducted an unscheduled visit of K&W. 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. Unfortunately, landfill operator Mr. Shawn Taisto was away from the facility for a training and office manager Mrs. Linda Thorsons was out of the office as well. I had a brief conversation with Mr. George Bittner, equipment operator, about any major changes since my last visit in August of 2015. Mr. Bittner stated that to his knowledge there were no major changes in the operation of the landfill or additional equipment acquired.

On 2/04/2016 I revisited the facility with DEQ OWMRP staff Carolyn St. Cyr on a scheduled joint inspection. Mr. Taisto was present at this time and we proceeded to his office upstairs where he provided copies of the asbestos waste handling records and disposal locations. Waste manifests for all other municipal waste, etc., were accessed using Waste Management's internal database.

#### EMISSION UNIT DETAILS

Emission Unit ID	Description of Emission Unit	ROP/PTI#	Installation/Modification Date	Compliance Status
EULANDFILL	This emission unit is of a landfill which has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters, but actual emissions based upon an established Tier 2 value in the landfill calculation are less than 50 megagrams. This landfill also has received a volume expansion permit to increase design capacity from the DEQ after May 30, 1991, and therefore making the landfill subject to NSPS WWW.	MI-ROP-N6039-2012	1984 / 2-12-2004	C
EUASBESTOS	The landfill is actively or has accepted asbestos waste in the past.	MI-ROP-N6039-2012	1984	C

#### EULANDFILL

I. EMISSION LIMIT(S) – NA

II. MATERIAL LIMIT(S) – NA

III. PROCESS/OPERATIONAL RESTRICTION(S) – NA

IV. DESIGN/EQUIPMENT PARAMETER(S) – NA (Landfill < 50 Mg/year)

V. TESTING/SAMPLING – Tier 2 testing to demonstrate the NMOC annual emissions rate was performed in 2009 and demonstrated that the facility was below the 50 Mg threshold for NMOC annual emissions (2.19 Mg). Current modelling indicates that NMOC emissions in 2034 would be 34 Mg/yr, still below thresholds prescribed in 40 CFR 60 WWW.

VI. MONITORING/RECORDKEEPING – 5 year record retention on-site of design capacity report, current amount of solid waste in-place, and year-by-year waste acceptance rate were all provided upon request.

VII. REPORTING – All required ROP reporting has been submitted in a complete and timely manner.

EUASBESTOS

I. EMISSION LIMIT(S) – NA

II. MATERIAL LIMIT(S) – NA

III. PROCESS/OPERATIONAL RESTRICTION(S) – The entire facility was adequately fenced and properly signed to dete the general public. Asbestos containing material is logged in, surveyed for latitude, longitude, and elevation, and buried properly.

IV. DESIGN/EQUIPMENT PARAMETER(S) - The facility is currently not required to install gas collection. However, in tl event that they were, all locations of asbestos containing materials taken in at the facility have been recorded on a ma of the facility.

V. TESTING/SAMPLING – NA

VI. MONITORING/RECORDKEEPING – Review or records of the last 12 months demonstrated that the records are kept in a timely manner. Information relating to generator identification, transporter identification, quality of material, containment, and location of material are all being kept in a compliant manner.

Wenck Associates, Inc. (Environmental Engineers section) is the consultant which surveys and provides records for asbestos disposal locations. Wenck utilizes GPS lat/long recording specific disposal sites and displays these on a ma as illustration and numerical data.

VII. REPORTING – Semi-Annual and Annual Reporting is being performed in a timely manner. There are no records of requests to disturb placed waste and no indications of the need to do so.

VIII. STACK RESTRICTIONS – NA

IX. OTHER REQUIREMENTS—NA

EXEMPT SOURCES

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUTANK	Leachate Storage Tank	336.1212(4)(c)	336.1284(l)
EUENGINE	Exempt Internal Combustion Engine	336.1212(4)(d)	336.1285(g)

EUTANK – This tank is a 500,000 gallon AST for leachate collection. While the leachate may be recirculated back into the landfill, however it is currently being sent to a wastewater treatment plant and not recirculated. Based on annual leachate volume and leachate VOC concentration, the leachate is considered a non-VOC containing liquid and is exempt from inclusion in the ROP.

EUENGINE – K&W does not have reciprocating internal combustion engines (RICE) equipment that meets the requirement definitions under the MACT Subpart ZZZZ and NSPS Subpart JJJJ for stationary RICE or stationary SI ICE respectively. The RICE and/or SI ICE equipment at K&W are classified as nonroad engines and do not meet the definition of stationary engines.

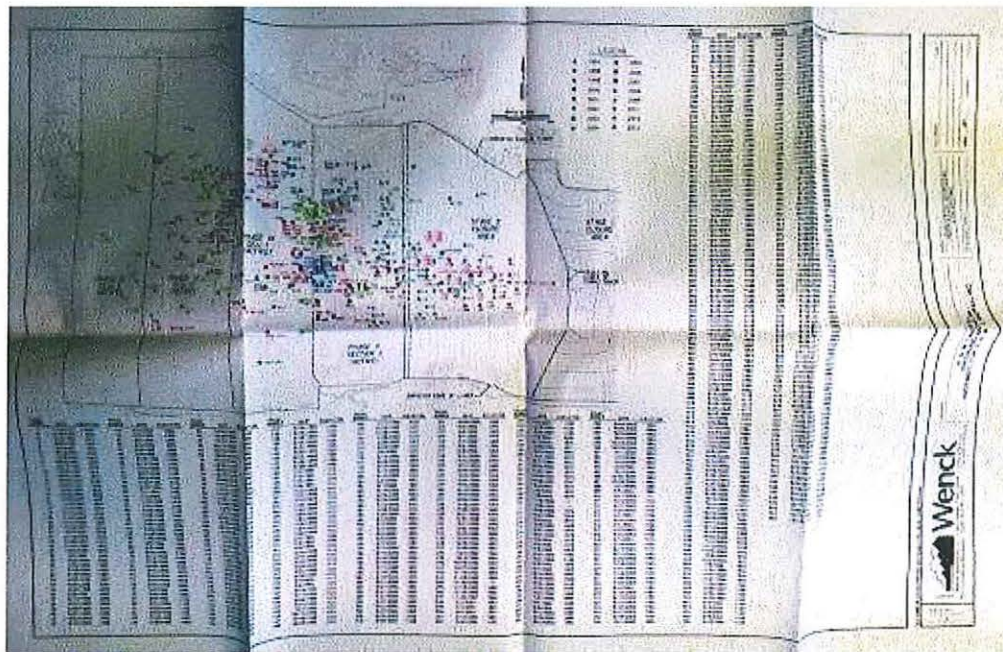
SUMMARY

No violations of ROP #MI-ROP-N6039-2012 were observed at the time of this inspection and the facility appears to be i compliance with the ROP.



KW LANDFILL			
Leachate Recirculation and Transporting			
2015			
Month	Recirculated	Transported	
January	0	441,880	
February	0	370,600	
March	0	860,560	
April	0	767,110	
May	0	478,350	
June	0	415,260	
July	31,630	311,280	
August	6,160	473,710	
September	0	303,880	
October	0	190,600	
November	0	110,730	
December	0	379,530	
Total	37,790	5,101,690	

Image 1(K&W 1) : Leachate



**Image 2(K&W 2) :** Asbestos burial locations



012015  
elevation  
1130.7  
NR 101108 cost 4484.4

Michigan Department of Natural Resources  
Air Quality Division  
WASTE SHIPMENT RECORD

Under authority of NESHAP, 40 CFR, Part 61 Subpart M, up to \$25,000/day/ violation penalty for noncompliance.

PROF # ASB115589M1

GENERATOR	1. Work Site Name and Mailing address: 15125 Bellie Painesdale, MI 49855		Owners Name Houghton County Kathleen Beattie	Owners Telephone No. 9064620560	
	2. Operators name and address: Upper Peninsula Abatement Company, INC. 349 US Highway 41 Negaunee, MI 49866		Operators Telephone No. 906 473 4900		
	3. Waste disposal site (WDS) name, mailing address and physical site location K & W Landfill 11877 Hwy 38 Ontonagon, MI 49853		WDS Telephone No. 906 383 3504		
	4. Name and Address of Responsible Agency Air Quality Division, Michigan Department of Natural Resources PO Box 30028 Lansing, MI 48909				
	5. Description of materials: Keramic Tile Adhesive & Disbanded Tiles		6. Containers: 6 ml poly Number Type cubic yds	7. Total Quantity 5705 (12.88702)	
	8. Special handling instructions and additional information Double bagged				
	9. Operator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and government regulations. Printed/Typed name and title: _____ Signature: _____ Date: 1/20/15 Date Carrier, Owner: _____				
	TRANSPORTER	10. Transporter 1 (Acknowledgement of receipt of materials): Printed/Typed name and title: _____ Signature: _____ Date: 1/20/15 Date Carrier, Owner: _____ Address and Telephone No.: 349 US 41, E. Negaunee, MI 49866 906 250 6710			
		11. Transporter 2 (Acknowledgement of receipt of materials): Printed/Typed name and title: _____ Signature: _____ Date: _____ Date Carrier, Owner: _____ Address and Telephone: 349 US 41, E. Negaunee, MI 49866			
		12. Discrepancy indication space:			
DISPOSAL SITE	13. Waste Disposal Site Owner or Operator Certification of receipt of asbestos materials covered by this manifest except as noted in item 12. Printed/Typed name and title: _____ Signature: _____ Date: 1-20-15 Operations Specialist Jinda Thoreson				

Friable 2015

Image 3(K&W 3) : Friable asbestos manifests



**WASTE SHIPMENT RECORD/ASBESTOS MANIFEST**  
(See Appendix for Instructions)

1. A. Special Waste Profile Number <b>AS811737AMI</b>		B. HCBWP Manifest YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	C. WSP Number <b>908361</b>	For Disposal Site Use Only EPA/MSHA Form 3540-101 Revision: _____ Date: _____									
1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) <b>ROBERT STADK 702 SOUTH ST HANCOCK MI 49930</b>			1-C. Generator's Phone Number <b>906-373-7030</b>										
1-D. Waste Site Address <b>20603 4TH ST COBUQUANTOWN HANCOCK MI 49930</b>			1-E. 24 Hour Emergency Response Telephone Number <b>906-523-7030</b>										
2. Operator's Name and Complete Mailing Address <b>TIM EFRANSON 16527 LARSON RD. ATLANTIC MINE MI 49905</b>			Operator's Phone Number <b>906-370-1370</b>										
3. Waste Original Site (WSP) Name and Complete Mailing Address <b>K &amp; W LORSEN 11877 N 34 OSHTONOGON MI 49953</b>			WSP's Phone Number <b>(906) 883-3504</b>										
4. Name and Address of Responsible Agency State of Michigan, Department of Natural Resources 1125 Military Avenue, Grand Bay, MI 49937			State of Michigan, Region 1 Headquarters 1990 US Highway 41 South, Marquette, MI 49955										
5. Description of Materials		6. Containers		7. Total Quantity									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>HAZARDOUS</td> <td>Asbestos, W. N4210, 14 PG</td> <td></td> <td></td> </tr> <tr> <td>NON-HAZARDOUS</td> <td>Cell # 1</td> <td>Cell # 2</td> <td></td> </tr> </table>		HAZARDOUS	Asbestos, W. N4210, 14 PG			NON-HAZARDOUS	Cell # 1	Cell # 2		4		25 501 TONS	
HAZARDOUS	Asbestos, W. N4210, 14 PG												
NON-HAZARDOUS	Cell # 1	Cell # 2											
8. Special Handling Instructions and Address Information BY HOW MUCHES GIVEN IN HERE TO DISPOSAL, MUST BE BURIED.													
9. GENERATOR/OPERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping names and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, according to applicable international and government regulations. I hereby certify that the substance is not controlled self-heating, DCS, under any special needs.													
Printed Name and Title <b>TIM EFRANSON</b>		Signature <i>Tim Efranson</i>		Date <b>10-12-15</b>									
10. Transporter 1 Company Name Complete Mailing Address <b>KTC 46970 HWY M-26 HOUGHTON MI 49931</b>			Driver Signature <i>Matthew R. Feinell</i>										
Telephone Number (including area code) <b>906-482-3825</b>			Printed Name and Title <b>Matthew R. Feinell</b>										
11. Transporter 2 Company Name Complete Mailing Address			Driver Signature										
Telephone Number (including area code)			Printed Name and Title										
12. Discrepancy Information Box			Date										
13. Waste Disposal Site Name or Location Special Waste Approval is shown by signature in the box of a Statewide Asbestos Approval Certification of receipt of asbestos materials received by the disposal facility as noted in item 11.													
Printed Name and Title <b>George Bittner operation</b>		Signature <i>George Bittner</i>		Date <b>10-13-15</b>									

Image 4(K&W 4) : Nonfriable asbestos manifests

NAME *Joseph S...* DATE 2/29/16 SUPERVISOR *Dan W. Malin*