

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

N803524409

FACILITY: CAPITAL REGION AIRPORT AUTHORITY		SRN / ID: N8035
LOCATION: 3170 WEST STATE RD, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: CLINTON
CONTACT: Ron O'Neil, Director of Maintenance		ACTIVITY DATE: 02/25/2014
STAFF: Michelle Luplow -	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, announced compliance inspection, targeted to conduct inspection while incinerator is running.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Ron O'Neil, Director of Maintenance (roneil@craa.com); Rick Tyler, AVFlight

Purpose: Conduct an announced, scheduled compliance inspection by determining compliance with Capital Region Airport Authority's (CRAA) Permit to Install (PTI) No. 118-08 for a natural gas-fired 200-CA Destructor Waste Incinerator, paying close attention to the incinerating process and any indications of opacity/fallout during the burn.

Facility Background/Regulatory Overview: Capital Region Airport Authority (CRAA) is an international airport that incinerates/accepts all regulated waste from their international flights, including flights from Punta Cana, Dominican Republic; Cancun, and Mexico; Jackson National Life Insurance, a private entity, also uses CRAA incineration services for flights to and from London, England. Frontier Airlines are the international flight operators. Sun Country is no longer doing international flights.

Inspection: This was an announced compliance inspection. At approximately 8:30 a.m. on February 25, 2014 I met with Ron O'Neil, the new Director of Maintenance. I explained to R. O'Neil what occurs during an inspection and provided him with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure to illustrate a typical inspection procedure.

R. Tyler explained that burns are typically conducted once per week (Tuesday). Waste that was collected Friday, Saturday and Sunday is brought to AVFlight's storage area. This waste, along with Monday's waste, is brought to the incinerator building on Monday to burn on Tuesday. CRAA is required, per their compliance agreement with APHIS, to burn waste within 72 hours of receipt. He also said that international flights typically run from January through the first week of April, with occasional international flights for Jackson National, which may occur as late as September. R. Tyler said the burning of waste will probably go on until 5 p.m.

Waste Management Program

According to condition 1.7 of PTI No. 118-08, the incinerator must not be operated unless the procedures outlined in the waste management plan (Appendix C of permit) are implemented and maintained. CRAA has a compliance agreement with APHIS (Animal and Plant Health Inspection Service) which addresses each of the conditions in Appendix C. The Compliance Agreement is reviewed every year and the most recently updated version was approved on July 7, 2013. I spoke with the Department of Agriculture on the phone and they explained that all international waste acceptors' compliance agreements for the State of Michigan through APHIS are set for review and updates this year.

1. Containers

While watching the incineration process from weighing the bags, to placing them into the incinerator, I verified that CRAA uses yellow plastic bags labeled, "Foreign Waste" that are closed with zipties. CRAA has labeled, lockable plastic storage containers that are labeled "International Trash Only" which I verified onsite. CRAA is in compliance with the "Containers" condition of the waste management program.

2. Storage

AVFlight are the "caterers" who pull the regulated waste off the aircraft. He said AVFlight either stores the regulated waste at their facility, which is located on CRAA grounds, or they take it directly to the incinerator building. Any location where the waste is stored must be restricted to deny access by unauthorized persons. The incinerator building has a sign on its entrance door: "Authorized personnel only." Per June 2013's inspection, I

followed up on verifying if there was a restricted access sign also on AVFLIGHT's storage building door. There was no sign and I informed R. O'Neil onsite that this door should also have a restricted access sign posted. R. O'Neil sent me via email a photo of AVFLIGHT's door with the appropriate sign posted on the outside (see attachment).

At either storage location, the waste is kept within a building, away from the natural elements.

R. O'Neil verified that CRAA still has a contract with Rose Pest Solutions, a service that includes checking and clearing of traps located inside and outside of the incinerator building once per month. CRAA is in compliance with the "Storage" condition of the waste management program.

3. Process/Control Device

Charge materials are handled in a manner that minimizes introduction of contaminants into the air. T. Haizlip said, at the previous inspection, that AVFlight collects waste from the international flights into 4 mil (thick) bags which are placed in the labeled/locked plastic containers and then transported in an enclosed trailer to the storage facility. R. Tyler said the ashes from the incinerator are collected after every burn and placed into an open drum lined with a garbage bag; once the bag is full, it is tied up, removed from the site, and sent to Granger Wood Street Landfill. CRAA is in compliance with the "Process/Control Device" condition.

4. Spill containment and clean up

R. Tyler verified that the same spill containment and clean-up procedures noted in the June 2013 inspection report are still the same used currently. CRAA is in compliance with the "Spill containment and clean up" condition.

5. Recordkeeping

I verified that the conditions in Appendix C for this condition were being adhered to; however, CRAA is not limited to these few recordkeeping conditions and must keep all required records requested in the Compliance Agreement. CRAA's "customer" is always AVFlight, which is located at the airport on Circle Drive West. All records related to storage and incineration list AVFlight as the customer and as the waste deliverer to the incinerator. CRAA is found to be in compliance with the "Recordkeeping" condition.

6. Prohibited Waste

R. Tyler said that all information provided by T. Haizlip at the June 2013 inspection is still the same: CRAA is not allowed to incinerate any medical or infectious waste, or mercury-containing wastes. T. Haizlip said that the airplanes have onboard sharps and pathological waste containers. These containers are removed from their hub in Minneapolis. None of the pathological waste is removed at the CRAA site. CRAA is in compliance with this "Prohibited Waste" condition.

CRAA is in compliance with condition 1.7.

Emission Limits

1.1 The emission limit is 0.10 lb PM/1,000 lbs exhaust gases. A stack test has never been requested by the DEQ since the incinerator's installation to determine compliance with this limit.

Material Usage Limits

1.2 CRAA classifies their international waste as Type 1 Waste, which is a mixture of combustible waste such as paper, cardboard, wood scrap, foliage and combustible floor sweepings, and this type of waste may contain up to 20% by weight of restaurant or cafeteria waste but contains little or no treated papers, plastic or rubber wastes.

The majority of the waste is composed of knives, forks, paper plates, napkins, bottles and cans, with little to no animal/vegetable waste. Type 1 waste can be incinerated at 200 lbs/hr, where only 66.67 lbs of waste can be incinerated per charge. CRAA is in compliance with condition 1.2.

Process/Operational Limits

1.3 & 1.4 CRAA is not allowed to burn more than 200 lbs/hr based on the waste type. R. Tyler said that he usually weighs about 40 lbs-worth of foreign waste bags to burn in the incinerator and said that more than 40 lbs wouldn't burn very efficiently.

I recorded numbers for a previous burn done on 2/18/14 (all records are kept in the incinerator building)

Time	Pounds
9:00	8.99
	3.83
	7.21
9:05	12.03
	5.84
	2.44
(Hour Total)	40.34
10:05	8.46
	3.04
	1.99
	4.82
(Hour Total)	18.31

None of the totals for the hours exceed 200 pounds, nor do they exceed the 66.67 lbs/charge. In between charges, R. Tyler shifts the ash/regulated waste in the incinerator to ensure a proper burn. CRAA is in compliance with conditions 1.3 & 1.4.

Condition 1.5 requires that the incinerator not combust waste unless the afterburner maintains a minimum temperature of 1600F. When I arrived at the incinerator, R. Tyler had already charged the incinerator with a couple bags of waste. The temperature was at 1788F and the incinerator had already been burning for 15 minutes. While I did not verify 1600F upon startup, R. Tyler said that he waits for the afterburner temperature to reach 1700F before charging waste. CRAA is in compliance with condition 1.5.

Condition 1.6 requires that the incinerator be installed, maintained, and operated in a satisfactory manner; a list of *recommended* operating and maintenance procedures is supplied in Appendix B (Incinerator Operation and Maintenance Guidelines) of the permit. The first recommendation is to have trained operators for the incinerator. R. Tyler acknowledged he had been trained. A list of training records is kept in R. O'Neil's office. Appendix B also recommends that the incinerator grates be cleaned prior to each day's incinerations; R. Tyler said that before every burn he removes the previous burn's ashes from the incinerator.

Operational guidelines also recommend minimizing the frequency the charge door is opened. As I understand, the frequency of opening the charging door is minimized because R. Tyler only opens the door once per hour to mix the waste materials/ash and then throw in the remainder of the charge. This minimal opening of the door minimizes or eliminates the potential for smoke. When arriving and leaving the incinerator site, there were no visible emissions from the stack, nor was there fallout on the ground/on the snow. I told R. O'Neil that it is recommended they keep a copy of Appendix B near the incinerator. He sent me a photo that this was completed, via email on 3/14/14 (see attachment). I did not verify when the incinerator was last inspected, whether combustion air was adjusted according to manufacturer's instructions, or verified steps CRAA takes to follow manufacturer's instructions. CRAA is in compliance with condition 1.6.

Recordkeeping/Reporting/Notification

Condition 1.9 requires that daily records of the time, description and weight of waste combusted be kept. At the incinerator building a logbook is kept where each bag of waste is individually entered, along with its weight, and the date the waste was incinerated, as aforementioned in the condition 1.3&1.4 discussion.

Condition 1.10 requires secondary combustion chamber temperature records be kept. During the June 2013 inspection, records were provided showing that secondary combustion chamber temperature records were being kept. R. O'Neil (Director of Maintenance as of December 2013) said he found the data file (.DAT file) that contains all of the continuous temperature data for the incinerator, but was not able to get it translated into a readable file at this time. Future inspections at the site should include viewing of this data.

The site (incinerator building) was clean, and appeared to be well-maintained.

Capital Region Airport Authority is in compliance with all conditions contained in their Permit no. 118-08 for the incinerator.

FYI for future inspections: R. O'Neil had me park in the short term parking lot off of the main road into the airport. He provided me with validated parking and met me in the parking lot.

NAME Michelle M. Byrd

DATE 3-17-14

SUPERVISOR [Signature]