

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Records Review (In office)

N268954037

FACILITY: VIENNA JUNCTION LANDFILL		SRN / ID: N2689
LOCATION: 6505 HAGMAN RD, ERIE		DISTRICT: Jackson
CITY: ERIE		COUNTY: MONROE
CONTACT: Christina Pearce , Team Environmental Manager		ACTIVITY DATE: 06/17/2020
STAFF: Diane Kavanaugh Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Major T5 Facility FCE/PCEs. ROP Section 1: VJ LF and Section 2: VJ Energy. Documents the review of company required recordkeeping. Compliance records were requested by email and received electronically.		
RESOLVED COMPLAINTS:		

This report documents recordkeeping received and reviewed for Vienna Junction Landfill (VJ LF) and Vienna Junction Energy (VJE). ROP MI-ROP-N2689-2020 has two Sections. The compliance inspection was conducted on 6/17/20 and is documented in the separate Scheduled Inspection report of that date, and the Self Initiated inspection report covers the PCE Surface Emission Monitoring (SEM) inspection of that date. The scheduled inspection was conducted by Diane Kavanaugh Vetort, AQD the PCE SEM was conducted by Mike Kovalchick, AQD.

EGLE-AQD (DKV) sent emails requesting electronic records from VJ LF Republic contacts Christina Pearce (CP), Environmental Mgr. (acting for Dawn Wright), and John Bolyard (JB), LF Manager. On 6/9/20 emailed to schedule the inspection & requested three documents. On 6/12/20 emailed a pre-inspection request for compliance records, and on 6/16/20 emailed request for an additional two recordkeeping items.

CP provided the following requested records by email on the following dates for VJ LF: 6/15, 6/19, 6/22 and 6/23. VJ SEM Reports 2020 Q1 and Q2 and an As-built site diagram were received prior to the inspection on 6/15/20.

The remaining records received following the inspection included: the Enclosed Flare operational data from May 2019 - May 2020; Asbestos notification & handling; Well head data May 2019-May 2020; SSM events Jan 2020 - May 2020; and Cover Integrity inspections May 2019-May 2020. CP provided the following responses within AQD email below:

FGLANDFILL-XXX , FGLANDFILL-WWWW

1. Condition V., VI.1.: SEM reports for the most recent two Quarters (this may or may not end with 2nd Quarter 2020 depending on if it has been conducted). Emailed to you 6/15/2020
2. Condition VI.2: Monthly Cover integrity and maintenance reports for the 12 month period ending May 2020. Appended
3. Condition VI.3: Records of SSM events for period January through May 2020. Appended

FGACTIVECOLL-XXX, FGACTIVECOLL-WWWW

1. Condition III.4.: Any SSM events where GCCS was inoperable during 2020? Please describe. Appended
2. Conditions VI.4.: Monthly well field monitoring data for the 12 month period ending May 2020. Appended
3. Summary report of any construction activities involving the GCCS system during the 12 month period ending May 2020. Summary of planned construction activities for 2020. During the period May 2019 through May 2020, the gas collection system was expanded at the Vienna Junction Landfill by the addition of two (2) new and twelve (12) replacement wells including associated vacuum laterals, valves as well as air and force main.

FGENCLOSEDFLARE-XXX, FGENCLOSEDFLARE-WWW

1. Condition III.1-4.:SSM events that occurred during 2020 and status of PMP/SSM Plan updates or changes. Appended. No changes have been made to the PMP/SSM Plan
2. Condition V.2. Status of Performance Testing due within 5 years of the date of the last test. I don't have the last test date available to me at this time. **This is likely past due and should be scheduled as soon as possible.** This is a new permit language and we didn't interpret that this had to be initiated immediately. We will submit a test plan for approval and schedule testing.
3. Conditions VI.1-2: Actual operating records, hours, temperature, and landfill gas flow rate, for the 12 month period ending May 2020. Pending- having issues with file size
4. Summary of significant Flare maintenance during the 12 month period ending May 2020. During the period May 2019 through May 2020, the following significant flare maintenance tasks were performed at the Vienna Junction Landfill.
 - Installation of new air compressor; May 2020
 - Annual flow meter calibration; January 2020
 - Annual Flare Inspection; October 2019
 - Remove and clean flame arrestor; October 2019
 - Disassemble and clean knock out pot; October 2019

EUASBESTOS

1. Condition III.1. a.- d.: Statement with details of how compliance is being maintained.

When a waste containing regulated asbestos enters the facility, the driver is directed to a designated area on the working face. The waste is unloaded in such a manner as to minimize visible emissions. At the end of each operating day (or at least once every 24-hour period while the site is in continuous operation) the asbestos-containing waste material is covered with at least six (6) inches of compacted nonasbestos containing material or covered with a resinous or petroleum based dust suppression agent that effectively binds dust and controls wind erosion. The location is recorded on a site map and maintained on site until closure of the facility.

2. Conditions VI.1-4.: Summary with example documents demonstrating compliance over the 12 month period ending May 2020.
 - Appended- We selected from every month between May 2019 and May 2020
3. Condition VII.7.: Notification verification for the current construction season. Appended

DKV sent an email to VJE Fortistar contact Suparna Chakladar, to request operational status of the Treatment Plant and offsite LFG user. VJE reply confirmed the Treatment System is not operational. (Filed)

VJ COVER INSPECTION REPORTS MAY 2019 TO MAY 2020 (Compliance Concern)

Reports from May 2019 through August 2019 indicate same area of ponding water problem with the cover continued without repair/correction.

Reports from May 2019 through July 2019 indicate the same leachate problem with the cover continued without repair/correction until the August 2019 report where it is stated the leachate weeps were drying out after installation a weep sump JB-2. A new Leachate weep is noted in the September 2019 report without repair/correction noted.

Reports May 2019 through September 2019 indicate the same dead vegetation problem with the cover continued without repair/correction. The October 2019 report identifies a new dead vegetation problem at Well 93.

Reports November 2019 through May 2020 indicate no problems with the Cover and no other repair/correction comments.

VJ WELLFIELD LOG DATA MAY 2019 TO MAY 2020 (Note: Log only contains Well ID and the three NSPS monitored parameters). On 7-10-20 CP sent me VJ list of current AOS/HOVs per request. Attached to report to file.

Oxygen >5%: It appears approved Alternative Compliance Timelines (ACT), Alternative Operating Scenarios (AOS) or Higher Operating Values (HOV) cover the non-compliant wells during this period.

EW32R, EW35, EW49, and Leachate collection riser LR64 have an AOS burp variance (O2 monitor & shut off if >5%; turn back on, re-monitor & repeat) for one year expiring August 2020.

EW087, EW051R, EW085, had an ACT until June 30, 2020 to correct O2 exceedances.

EW81R2 had an ACT to correct positive pressure until February 28, 2020 and records indicate it did clear that month.

There were no unresolved or unaccounted for Temperature or Positive Pressure exceedance. The current GCCS Plan submitted in 2017, lists EW98, EW101R, EW53R, EW63R2, EW81R, EW82R, EW54R have Temperature HOVs; LCR6-1 has an O2 HOV; and EW30R has an AOS.

Pressure data was reviewed to determine if very low pressure exists on a high number of wells. The criteria of "less than -15 inches H2O was identified as low. (*Compliance concern letter to be issued considering high number of SEM hits identified during the inspection.*)

VJ ENCLOSED FLARE FLOW & TEMPERATURE DATA MAY 2019 TO MAY 2020

Flare appears to be operating at reduced capacity, not near its maximum rated capacity of 3000 scfm. The vacuum appears to be averaging around -55 inches. It is most often in the range of 45 to 55 inches. Otherwise it appears to operate at consistent flow rates (scfm) and temperature. The ROP issued March 2020 requires performance testing of the flare within 5 years of the prior testing. VJ is well past that and will need to schedule testing soon. This was discussed with CP and JB during the inspection.

VJ MONTHLY COMPREHENSIVE REPORTS 2020 (Received by email on 7-10-20)

CP emailed the monthly reports for January 2020 through May 2020. AQD shared these reports with Materials Management Division (MMD). The reports include the listing of high methane wells, indicated by >58% methane monitored. It is concerning that a high percentage of the total 102 Wells, approximately 54% were at this level during the November 2019 thru January 2020 period. However it appears that every month that percentage has dropped since then indicating the focus on these wells is working. There were 37 wells >58% in January; 30 in February; 29 in March; and 28 in May.

Pump cycles and wells with pumps were included in the above report. There is an indication that most pumps are not operational or are operating at very low rates. Especially during April and May, they were almost completely turned off with comment that it was due to installation of the new compressor at the Flare compound. AQD does not currently have "Liquid in Wells data" from VJ so was not able to determine the number of wells potentially watered in. (*Compliance concern request analysis of well liquid levels and vacuum analysis.*)

The comprehensive reports include the full Well log monitoring data. Each report indicates which NSPS

was exceeded, the number of total exceedances for the month, the number corrected and the number open at the end of the month. The negative pressure was reviewed for the May 2020 report. This parameter appears to coincide potentially with the high number of SEM hits during the 6/17 survey, and the fact that the flare scfm averages below 2000 scfm and is commonly around 1500 scfm. There appears to be many wells with very low vacuum, AQD set a value at readings below - 15 inches. 68 of the 102 wells had readings below this level in May, and most were below -10 inches vacuum. (Compliance concern item)

The reports include the Enclosed Flare monthly monitoring data and downtime (start-up, shut-down, malfunction reports).

The SEM that AQD conducted in June indicated numerous methane hits above 500 ppm. AQD has compliance concerns that several factors may be influencing this. The number of wells with high methane, the low vacuum of the wells (negative inches water column); the potential of water in wells and either no pumps or inactive pumps; and cover conditions.

COMPLIANCE SUMMARY

AQD sent a follow up Compliance Concern letter to VJ to request additional information and notify them of the identified concerns. Overall AQD determination is VJ is in substantial compliance with the conditions of their ROP at this time. The SEM results letter was issued to VJ separately and requires they address the SEM hits identified, with reporting to AQD in their regular 3rd Quarter NSPS SEM report.

NAME *[Signature]*

DATE 9/10/20

SUPERVISOR *[Signature]*