

## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Southeast Berrien County Landfill Authority	<b>SRN :</b> N5432
<b>Location :</b> 3200 Chamberlain Rd.	<b>District :</b> Kalamazoo
	<b>County :</b> BERRIEN
<b>City :</b> BUCHANAN <b>State:</b> MI <b>Zip Code :</b> 49107	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Matthew Deskins
<b>FCE Begin Date :</b> 8/18/2021	<b>FCE Completion Date :</b> 8/18/2022
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
08/18/2022	On-site Inspection	Compliance	Unannounced Scheduled Inspection
04/18/2022	MAERS	Compliance	Annual Emission Statement submitted using Michigan's on-line reporting system (MAERS)
04/05/2022	NSPS (Part 60)	Compliance	This is the Semi-Annual NSPS report for the LFG Treatment System. This report has a few things that need to be reported if necessary but it typically just lists the downtimes of the control system greater than one hour. NOTE: New or updated landfill regulations are now in effect that ultimately replaced WWW, so moving forward, this report will be submitted strictly under 40 CFR Part 60 Subpart OOO and/or 40 CFR Part 63 Subpart AAAA. Please see the semi-annual/annual ROP certifications for comments as well as that file for a copy of the report.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	MACT (Part 63)	Compliance	This is NANR's Semi-Annual Start-Up, Shutdown, and Malfunction (SSM) Report. They stated that 7 start-ups, 7 shutdowns, and 0 malfunctions occurred during the reporting period. They further stated that corrective action taken to address them were consistent with the procedures outlined in their SSM Plan. They only have to report the events if their SSM wasn't followed in addressing them and/or an exceedance of an applicable emission limit had occurred. NOTE: On September 27, 2021 a revised MACT AAAA took effect and it no longer requires SSM events to be recorded nor reported unless required by another rule.
04/05/2022	NSPS (Part 60)	Compliance	This/These are Semi-Annual GCCS Reports required under 40 CFR Part 60 Subpart WWW, 40 CFR Part 60 Subpart OOO, and/or 40 CFR Part 63 Subpart AAAA. New or updated landfill regulations are now in effect that ultimately replaced WWW, so moving forward, this report will be submitted strictly under 40 CFR Part 60 Subpart OOO and/or 40 CFR Part 63 Subpart AAAA. See comments made under the ROP Certification Report and also, please refer to the ROP Certification Report file for a copy of this report.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	ROP SEMI 2 CERT	Compliance	<p>The facility reported 3 deviations for the reporting period and the 1st was for the open flare being down for more than one hour on several days for pre-scheduled preventative maintenance to it and/or the gas to energy plant. These flare downtimes are not considered violations since any type of emission exceedance cannot be determined. Also, the open flare is a back-up control device to the internal combustion engines owned by NANR and usually only runs if the plant is down. The 2nd Deviation was for a well that had a pressure exceedance that they did not take corrective action on within the initial 5 day timeframe. However, the exceedance was corrected within 15 days so staff will not consider it to be a violation. The 3rd deviation was for a surface methane exceedance that couldn't be corrected within 30 days. However, the landfill requested and the AQD approved an Alternate Compliance Timeline to conduct further corrective actions and the exceedance was ultimately remedied.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	ROP Annual Cert	Compliance	<p>The facility reported 5 deviations for the reporting period. However, the first 3 were for the same thing which was for the open flare being down for more than one hour on numerous days for pre-scheduled preventative maintenance to it and/or the gas to energy plant. These flare downtimes are not considered violations since any type of emission exceedance cannot be determined. Also, the open flare is a back-up control device to the internal combustion engines owned by NANR and usually only runs if the plant is down. The 2nd Deviation was for a well that had a pressure exceedance that they did not take corrective action on within the initial 5 day timeframe. However, the exceedance was corrected within 15 days so staff will not consider it to be a violation. The 3rd deviation was for a surface methane exceedance that couldn't be corrected within 30 days. However, the landfill requested and the AQD approved an Alternate Compliance Timeline to conduct further corrective actions and the exceedance was ultimately remedied.</p>
04/05/2022	MACT (Part 63)	Compliance	<p>This is the landfill's Semi-Annual Start-Up, Shutdown, and Malfunction (SSM) Report. They stated that 3 start-ups, 3 shutdowns, and 3 malfunctions occurred during the reporting period. They further stated that corrective action taken to address them were consistent with the procedures outlined in their SSM Plan. They only have to report the events if their SSM wasn't followed in addressing them and/or an exceedance of an applicable emission limit had occurred. For a copy of the report, please see the ROP Certification Report/File. NOTE: On September 27, 2021 a revised MACT AAAA took effect and it no longer requires SSM events to be recorded nor reported unless required by another rule.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	ROP Annual Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
04/05/2022	ROP SEMI 2 CERT	Compliance	The facility certified that no deviations occurred during the reporting period.
02/23/2022	MACT (Part 63)	Compliance	NESHAP 40 CFR Part 63 Subpart ZZZZ ANNUAL RICE MACT Report - The company certified that they were in compliance with all it's applicable requirements and staff did not note any issues. There aren't many requirements since the engines are fueled by landfill gas. The facility submitted an ROP Report Certification Form with the wrong "box" checked for the type of report. I contacted the facility and they submitted a new one that we received on March 1, 2022.
01/19/2022	Stack Test	Compliance	NSPS JJJJ Emission Test Report for CO, NOx, and VOC emissions for FGEngines-S1 through S3. The results reported indicated compliance with the various limits and a TPU Review of the results were in agreement.
11/30/2021	Stack Test Observation	Compliance	Stack Test Observation on Engines #1 and #3 as required for NSPS JJJJ Requirements for NOx, CO, and VOCs. Engine #2 was to be tested the following day but staff didn't attend it. Preliminary results during the test showed compliance with the applicable limits but that may change awaiting the testing of Engine #2 and the official test report.
10/27/2021	ROP R215 Notification		Rule 215(5) Notification of Change (Adding Brain Evans - COO, as a Responsible Official for Section 2)
10/05/2021	ROP R215 Notification		Rule 215(3) Notification of Change. The facility submitted this notification stating they wanted to "Opt-In" too only having to comply with 40 CFR Part 63 Subpart AAAA and not with requirements of 40 CFR Part 62 Subpart OOO nor 40 CFR Part 60 Subpart WWW that it replaces.

Activity Date	Activity Type	Compliance Status	Comments
09/27/2021	NSPS (Part 60)	Compliance	Semi-Annual NSPS/Landfill Gas Treatment System Report. See comments made under ROP Semi-Annual and/or Annual Certification. Refer to the ROP Certification file for a copy of the report.
09/27/2021	ROP Semi 1 Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
09/20/2021	MACT (Part 63)	Compliance	NANR's Start-up, Shutdown, and Malfunction Report (MACT AAAA). They reported that there were 7 start-ups, 7 shutdowns, and 0 malfunction events that occurred but none caused an exceedance of any applicable emission limit. They certified that all actions taken to correct them were consistent with the procedures outlined in their SSM plan kept at the facility. For a copy of the report, please refer to the ROP Certification File.
09/16/2021	ROP Semi 1 Cert	Compliance	The facility reported 1 deviation for the reporting period and it was for the open flare being down for more than one hour on a couple of days for pre-scheduled preventative maintenance to it and/or the gas to energy plant. These flare downtimes are not considered violations since any type of emission exceedance cannot be determined. Also, the open flare is a back-up control device to the internal combustion engines owned by NANR and usually only runs if the plant is down.
09/16/2021	NSPS (Part 60)	Compliance	Semi-Annual NSPS/Landfill Gas Treatment System Report. See comments made under ROP Semi-Annual and/or Annual Certification. Refer to the ROP Certification file for a copy of the report.

Activity Date	Activity Type	Compliance Status	Comments
09/16/2021	MACT (Part 63)	Compliance	This is the semi-annual SSM report for the landfill. The landfill reported that there were 2 start-ups, 2 shutdowns, and 0 malfunction events that occurred but none caused an exceedance of an applicable emission limits. They certified that all actions taken to correct them were consistent with the procedures outlined in their SSM plan kept at the facility. For a copy of the report, see the ROP Certification File.

Name: Matt Deskins

Date: 8-24-22

Supervisor:  8/24/22