

P0317

MANILA

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

P031735571

FACILITY: Ameresco Woodland Meadows Romulus LLC		SRN / ID: P0317
LOCATION: 4620 Hannan, CANTON TWP		DISTRICT: Detroit
CITY: CANTON TWP		COUNTY: WAYNE
CONTACT: Paul Pronishen ,		ACTIVITY DATE: 07/13/2016
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : July 13, 2016
 TIME OF INSPECTION : 10:00 am
 NAICS CODE : 486990
 EPA POLLUTANT CLASS : NOx, CO₂
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Paul Pronishen
 FACILITY PHONE NUMBER : 810-422-8922
 FACILITY EMAIL : ppronishen@ameresco.com

FACILITY BACKGROUND

Ameresco Woodland Meadows Romulus, LLC operates a landfill gas cleaning facility, and is located on the same property as Woodland Meadows landfill. Ameresco treats the landfill gas through processing equipment for subsequent sale to a third party end user. Ameresco currently sells the gas to Ford; however the facility is in the process of removing the majority of the current equipment and replacing it with new process. This new process will treat the gas through deoxidizer and other processes so that the resulting gas can be sold for distribution through DTE natural gas pipeline. The facility is currently in the planning phase, where they are working on obtaining all of the required permits. They hope to break ground on the process during the upcoming winter.

REQUIRED PPE

During the onsite inspection, steel toed shoes, a hard hat and a brightly colored safety vest were required to be worn.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility since the last onsite inspection. No violations have been issued regarding this facility since the last onsite inspection.

PROCESS EQUIPMENT AND CONTROLS

Landfill gas is piped to the facility from Woodland Meadows Landfill to the Ameresco site for treatment. The treatment system consists of moisture removal, via a knock-out pot, filtration to remove particles in the gas and a two stage compression. This is followed by refrigeration. The cleaned gas, called tail gas, is then sold to Ford and transported through a pipeline. Unused treated gas is piped back to Woodland Meadows Landfill, where it is burning off in either the North flare or a candlestick flare.

INSPECTION NARRATIVE

The inspection began with a meeting to discuss the operations at the facility. Mr. Pronishen explained that the facility is in the process changing the gas processing plant. The facility currently receives the landfill gas from Woodland Meadows. The plant is currently shutdown, and has been shut down since May 15, 2016. The client, Ford, is shut down while they

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replace a boiler. Currently all of the landfill gas is staying at Woodland Meadows is being flared off in one of the flares operated by Woodland Meadows. Ford plans to begin operation again in September 2016, though a definite date has not been given. Once Ford begins operating, the current treatment system will begin operating to supply the treated gas to Ford.

Ameresco is in the planning and permitting phase of transforming the gas treatment plant to a treatment plant that is capable of treating the gas to DTE pipeline quality. Most of the current equipment will be removed and the new process will be installed. I explained to Mr. Pronishen that the proper Permit To Install permits will need to be approved before the facility can begin installation of the new equipment. I also explained that this permit will be included in the ROP during the next renewal cycle.

Though Ameresco and Woodland Meadows Landfill qualify as a single stationary source per the AQD rules, the two facilities requested, and were given, two separate DRNs and two ROPs. I explained that when the ROP is renewed, the two sources will be combined into one source with two sections, in order to reflect the single source nature of the process.

APPLICABLE RULES/PERMIT CONDITIONS

Ameresco is currently operating under the Renewable Operating Permits (ROP) MI-ROP-P0317-2012a. This permit was issued on December 12, 2012 and was revised on February 2, 2016 to reflect a facility name change. The permit will expire on December 12, 2017. The administratively complete ROP renewal application is due between June 12, 2016 and June 12, 2017. This ROP covers three emission units, EUGASTREAT, EUOILSEPARATOR, and EUCOLDCLEANER.

EUGASTREAT: Emission unit that treats landfill gas before it is sold for use as fuel. The treatment system removes particulate to at least the 10 micron level, compresses the landfill gas, and removes enough moisture to ensure good combustion during subsequent use as a fuel.

- I. Emission Limits: NA – None listed in permit
- II. Material Limits: NA – None listed in permit
- III. Process / Operational Restrictions:
 1. NA – The treatment is currently shutdown and not treating any gas. All gas is staying with the landfill and is burned off at one of the flares.
 2. Compliance – The facility sites zero emissions when the facility is operating. All excess gas is piped back to the landfill.
 3. NA – The treatment system was currently shutdown during the onsite inspection.
- IV. Design / Equipment Parameters: Compliance – The AQD approved treatment system has operated since 1987.
- V. Testing / Sampling: NA
- VI. Monitoring / Recordkeeping:
 1. Compliance – Mr. Pronishen maintains all of the required records. The records were available for review during the onsite inspection.
 2. Compliance – Mr. Pronishen maintains a record of all preventive maintenance. A copy is attached to this report. The SSM report for the first half of 2015 was received on September 15, 2015 and for the second half of 2015 was received on February 12, 2016. No exceedances were reported in either of these reports.
 3. Compliance – No changes have been made to the control equipment since the

- last onsite inspection.
- VII. Reporting
1. Compliance – No deviations were reported during 2015.
 2. Compliance – The semiannual reports were received on time. Semiannual report 1 was received on September 15, 2015 and semiannual report 2 was received on February 12, 2016. Both reports were received on time and no deviations were reported.
 3. Compliance – The annual certification was received on February 12, 2016. No deviations were reported. The report was received on time.
 4. Compliance – The semi-annual reports were received on September 15, 2015 and February 12, 2016. Both reports were received on time. No exceedances were reported.
 5. NA – This treatment system has been operating since 1987. This report was submitted when operation began.
 6. Compliance – The semi-annual SSM reports were received on September 15, 2015 and February 12, 2016. Both reports were received on time. No exceedances were reported.
- VIII. Stack / Vent Restrictions – NA
- IX. Other Requirements
1. NA – During the onsite inspection, the gas treatment system was shut down due to the customer being shutdown. The system has been shut down since May 2016 and will be shut down until at least September 2016.
 2. Compliance – The facility has a SSM plan maintained onsite.
 3. Compliance – The facility has a preventive maintenance plan maintained onsite.

EUOILSEPARATOR: Oil / water separator used to treat condensate from the gas treatment plant prior to discharge to the sanitary sewage system

- I. Emission Limits: Compliance – The facility reports 0 pounds of VOC emissions for 2015.
- II. Material Limits: NA
- III. Process / Operational Restrictions: Compliance – The unit was covered during the onsite inspection
- IV. Design / Equipment Parameters: NA
- V. Testing / Sampling: NA
- VI. Monitoring / Recordkeeping: NA
- VII. Reporting
 1. Compliance – No deviations were reported during 2015.
 2. Compliance – The semiannual reports were received on time. Semiannual report 1 was received on September 15, 2015 and semiannual report 2 was received on February 12, 2016. Both reports were received on time and no deviations were reported.
 3. Compliance – The annual certification was received on February 12, 2016. No deviations were reported. The report was received on time.
- VIII. Stack / Vent Restriction: Compliance – No changes have been made to the stack since the last inspection. The stack was installed to the height and diameter listed in the permit.
- IX. Other Requirement: NA

FGCOLDCLEANERS: Any cold cleaner that is grandfathered or exempt from Rule 201. Ameresco does not operate any cold cleaning units. Therefore, this emission unit was now

evaluated.

MAERS REPORT REVIEW

MAERS was received on March 16, 2016. The emissions appear to have been reported accurately. The facility reports zero emissions because all of the landfill gas is treated and resold. Excess gas is returned back to the landfill and flared off. This report was reviewed on May 17, 2016.

FINAL COMPLIANCE DETERMINATION

Amerseco Woodland Meadows Romulus, LLC appears to be operating in compliance with all federal and state regulations as well as all ROP conditions. The facility is currently in the time period to submit the ROP renewal application. This application is due by June 12, 2017. The facility will also be submitting a PTI application for the gas treatment process changes that are planned to begin winter 2016.

NAME Jill C Zimmerman DATE 7/22/16 SUPERVISOR JK

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