
PO317 MANILA

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

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: 08/15/2017
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Target Inspeciton		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION TIME OF INSPECTION NAICS CODE EPA POLLUTANT CLASS		August 15, 2017 1:00 pm 486990 NOx, CO ₂
INSPECTED BY PERSONNEL PRESENT	: :	Jill Zimmerman Robert Bell Paul Pronishen
FACILITY PHONE NUMBER FACILITY EMAIL	:	810-422-8922 ppronishen@ameresco.com rbell@ameresco.com

FACILITY BACKGROUND

Amerseco 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 was selling the gas to Ford; however, in May 2017 Ford was given notice that Ameresco would no longer be supplying gas. Ameresco is in the process of installing a new gas 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 new process has been permitted and is in the process of being installed.

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, filtration to remove particles in the gas and a multi-stage compression. This is followed by refrigeration. The cleaned gas will then be sold transported through a pipeline. Untreated gas or gas that does not meet the quality required by DTE will then be flared in either an enclosed flare or a candlestick flare, which is maintained by Ameresco. Woodland Meadows will also be maintaining an enclosed flare and a candlestick flare that had been used to burn off gas that was unused by Ameresco under the old process. Woodland Meadows also has four additional flares that are not associated with Ameresco.

INSPECTION NARRATIVE

In May 2017, Ameresco shut down the ability to receive landfill gas from Woodland Meadows. and the installation of the new gas processing equipment began. The equipment is planned to be installed by about November 2017. The old equipment is still onsite, though it is no longer receiving gas, and can no longer operate. The facility plans to dismantle the old equipment and sell it once the new equipment is farther along in the installation process, and there is more physical room at the plant.

Mr. Bell and Mr. Pronishen explained in great detail the new process and we walked through the footprint of the process. The goal of the new process is to remove the imperfections from the landfill gas, leaving the remaining methane that can be used by the energy company in the pipeline. The landfill gas will pass through many different pressurized vessels and compressors to remove imperfections. The gas will then travel through a pipe to the edge of the property, where it will become the property of DTE. The finished gas will need to meet the specifications required by DTE before the gas will be accepted by DTE. Any gas that is not accepted by DTE will be piped back to Ameresco via a flush of natural gas from DTE to Ameresco where the unaccepted gas will be flared in one of two flares maintained by Ameresco.

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 SRNs and two ROPs. I explained that when the ROP is renewed, the two sources will be combined into one source with two sections, 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 renewal application has been received on time and is being processed. This ROP covers three emission units, EUGASTREAT. EUOILSEPARATOR, and EUCOLDCLEANER. However, this equipment is currently not operating and is in the process of being decommissioned by the facility. It will be replaced by the equipment permitted by PTI 61-16, which was issued on August 29, 2016. All of the annual and semiannual reporting requirements have been received on time during the past year.

MAERS REPORT REVIEW

MAERS was received on March 7, 2017. The facility reports 0 emissions because after they treat the landfill gas, the cleaned gas is sold to a third party. The remainder of the gas is sent back to Woodland Meadows Landfill, who flares off the tail gas. This facility is currently changing their process, so the emission units and emissions will look different next year.

FINAL COMPLIANCE DETERMINATION

Amerseco Woodland Meadows Romulus, LLC appears to be operating in compliance with all federal and state regulations. The conditions of the ROP were not evaluated since the equipment is no longer operating, and no landfill gas can be processed by this equipment. The conditions of the PTI were not evaluated since the equipment covered by this permit is in the process of being installed.

NAME