

Michigan Department of Natural Resources & Environment  
Air Quality Division

State Registration Number  
N5991

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N5991-2010

Citizens Disposal, Inc.

SRN: N5991

Located at

2361 W. Grand Blanc Road, Grand Blanc, Michigan 48439

Permit Number: MI-ROP-N5991-2010

Staff Report Date: July 5, 2010

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Natural Resources and Environment (MDNRE), Air Quality Division (AQD) prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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**STAFF REPORT**

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Citizens Disposal, Inc. 2361 W. Grand Blanc Road, Grand Blanc, Michigan 48439
Source Registration Number (SRN):	N5991
North American Industry Classification System (NAICS) Code:	4953
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200900161
Responsible Official:	1. Mr. Thomas Mahoney, General Manager 810-758-7280 2. Mr. Marc Pauley, Operations Manager 517-372-8330
AQD Contact:	Mr. Ken Damrel, Sr. Environmental Engineer, 517-335-6305
Date Permit Application Received:	10-21-2009
Date Application Was Administratively Complete:	10-21-2009
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	July 5, 2010
Deadline for Public Comment:	August 4, 2010

## **Source Description**

Citizens Disposal Landfill is a landfill which is located in Genesee County, on Grand Blanc Road adjacent to the US-23 freeway.

A landfill means an area of land or an excavation in which wastes are placed for permanent disposal. Citizens Disposal Landfill is classified as a Type II sanitary landfill, which is a Municipal Solid Waste (MSW) landfill. A "Municipal Solid Waste landfill" or a "Type II landfill" according to Act 451, Part 115, Solid Waste Management states:

A landfill which receives household waste incinerator ash or sewage sludge and which is not a land application unit, surface impoundment, injection well, or waste pile. A municipal solid waste landfill also may receive other types of solid waste, such as commercial waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial waste. Such a landfill may be publicly or privately owned.

Natural biological processes occurring in landfills transform the waste's constituents producing leachate and landfill gas. Initially, decomposition is aerobic until the oxygen supply is exhausted. Anaerobic decomposition of buried refuse creates most of the landfill gas. Landfill gas consists mainly of methane, carbon dioxide, and nonmethane organic compounds (NMOC). NMOC is the primary regulated air pollutant associated with landfill gas generation, which was promulgated as a regulated air pollutant under the Standards of Performance for New Stationary Sources, Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills (NPS Subpart WWW).

An active landfill gas collection system has been installed to collect the landfill gas. This system utilizes gas mover equipment to route the collected gas to the gas-to-electric plant and a flare or to another flare separate from the gas-to-electric plant. Seven internal combustion engines at the plant combust the gas, and drive turbines to make electricity. In the process, the engines combust methane, and nonmethane organic compounds, including VOCs and HAPs, in the collected landfill gas.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2008** submittal.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	147.2
Nitrogen Oxides (NO <sub>x</sub> )	81.2
Particulate Matter (PM)	9.0
Sulfur Dioxide (SO <sub>2</sub> )	4.8
Volatile Organic Compounds (VOCs)	45.1
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>1</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Genesee County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The source is not subject to R336.1220 for Major Offset Sources. Citizens Disposal Landfill (a MSW landfill) is subject to the Title V permitting (40 CFR Part 70 or 71) as a result of this source being subject to NSPS WWW per 40 CFR Part 60.752(b). The source is subject to NSPS WWW because Citizens Disposal Landfill's design capacity exceeds 2.5 million Mg and 2.5 million cubic meters. The facility is not considered a major source of hazardous air pollutant emissions because the potential emissions of any single hazardous air pollutant regulated by the Clean Air Act, Section 112, is less than 10 tons per year and the potential emissions of all hazardous air pollutants combined are less than 25 tons per year.

Furthermore, Citizens Disposal Landfill is subject to the asbestos regulations found in 40 CFR 61.154 because the landfill accepts asbestos. The facility contains a cold cleaner, regulated by Rule 707 (R 336.1707), in the maintenance shed.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ's "Procedure for Evaluating Periodic Monitoring Submittals."

The stationary source is not subject to the federal Compliance Assurance Monitoring (CAM) rule (40 CFR 64) because the emission limitations or standards for municipal solid waste landfills are covered by 40 CFR Part 63 Subpart AAAA. Thus municipal solid waste landfills are exempt from CAM requirements.

Please refer to Parts B, C, and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

### **Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-N5991-2005 are identified in Appendix 6 of the ROP.

PTI Number			
331-08	332-08		

### **Equivalent Requirements**

This permit does not include any equivalent requirements pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original PTI, a Consent Order/Judgment, and/or the State Implementation Plan.

### **Non-applicable Requirements**

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

### **Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

<b>Exempt Emission Unit ID</b>	<b>Description of Exempt Emission Unit</b>	<b>ROP Exemption</b>	<b>PTI Permit Exemption</b>
EUWASTEOIL	225 Gallon Waste Oil Tank	R336.1212(4)c	R336.1284(i)
EUHYDRAULICOIL	225 Gallon Hydraulic Oil Tank	R336.1212(4)c	R336.1284(i)
EUMOTOROIL	225 Gallon Motor Oil Tank	R336.1212(4)c	R336.1284(i)
EUDIESELTANK01	1000 Gallon Diesel Fuel Tank	R336.1212(4)c	R336.1284(i)
EUDIESELTANK02	1000 Gallon Diesel Fuel Tank	R336.1212(4)c	R336.1284(i)
EUDIESELTANK03	1000 Gallon Diesel Fuel Tank	R336.1212(4)c	R336.1284(i)
EUDIESELGEN	Diesel Generator	R336.1212(4)d	R336.1285(g)
EUENGINES	Five 8.6 Million BTU per hour Internal Combustion Engines	R336.1212(4)d	R336.1285(g)

### **Draft ROP Terms/Conditions Not Agreed to by Applicant**

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

### **Action taken by the DEQ**

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision-maker for the AQD is Gerald Avery, Field Operations Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

**RENEWABLE OPERATING PERMIT**

**October 28, 2010 STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated July 5, 2010, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	1. Mr. Thomas Mahoney, General Manager 810-758-7280 2. Mr. Marc Pauley, Operations Manager 517-372-8330
AQD Contact:	Mr. Ken Damrel, Sr. Environmental Engineer, 517-335-6305

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

**Changes to the July 5, 2010 Draft ROP**

No changes were made to the draft ROP.