



KENT COUNTY DEPARTMENT OF PUBLIC WORKS



June 1, 2022

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Mr. David L Morgan
Environmental Quality Specialist
EGLE Air Quality Division
Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503

Mr. Morgan:

This letter is written in response to the May 11, 2022 Violation Notice for the South Kent Landfill Flare, SRN N1324, Kent County.

In 2021, the flare emission of carbon monoxide (CO) was calculated to be 108.2 tons, exceeding the significance limit of 100 tons defined in Rule 119(e). This exceedance is not allowed under the flare exemption provided in Rule 285(2)(aa).

During 2021, the South Kent Landfill flare, was utilized for overflow of landfill gas from the onsite engines. Negotiations have been ongoing with EDL for the addition of a third engine to process the additional gas coming from the landfill. But in the meantime, beginning in late 2020, this additional landfill gas was sent to the flare. During 2021, the flare was run almost continually to process additional landfill gas.

Due to the nearly continuous operation of the flare throughout 2021, flow increased from a 2009-2019 annual average of approximately 11.476 MMCF, to 288.4857 MMCF in 2021. This additional flow resulted in increased flare emissions, exceeding the significance level for CO.

After using the flare nearly continually in the first quarter of 2022, it was taken offline for service on May 10, 2022 at approximately 8:00 AM. This was about the same time we were made aware of the significant CO emissions in 2021. Since the flare will be down for service for at least 2 months of 2022, there is little chance we could see the same total flow and emissions as 2021. But to ensure emissions are limited, operating controls will be put in place for the flare reduce the flow of gas to the flare. The most likely scenario will be to operate the flare in cycles, rather than continually.



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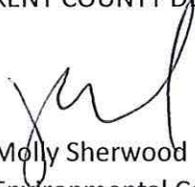
There is also the potential for a third engine to be added in 2023 to increase the volume of gas converted to electricity. If more gas were used by the engines, there would be less need to send gas to the flare, further reducing flow and emissions.

By reducing the flow of gas to the flare, and potentially adding a third engine, a concerted effort will be made to regulate flare emissions. It is highly unlikely that emissions limits will be exceeded again in the future.

Based on the limited nature of this occurrence and our ability to regulate future emissions through operational controls, it is our hope that a permit will not be required for the flare. But if a permit is still needed, we will be happy to prepare a permit application.

Please let me know if you have any questions or require any further information or documentation.

Sincerely,
KENT COUNTY DEPARTMENT OF PUBLIC WORKS


Molly Sherwood
Environmental Compliance Manager

c: Dan Rose – KCDPW (via email)
Tim Unseld – EGLE (via email)
Jenine Camilleri – EGLE

