

## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Ottawa County Farms Landfill	<b>SRN :</b> N3294
<b>Location :</b> 15550 68th Avenue	<b>District :</b> Grand Rapids
	<b>County :</b> OTTAWA
<b>City :</b> COOPERSVILL <b>State:</b> MI <b>Zip Code :</b> 49404	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Chris Robinson
<b>FCE Begin Date :</b> 9/18/2023	<b>FCE Completion Date :</b> 9/18/2024
<b>Comments :</b> FY '24 inspection	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
09/18/2024	ROP Semi 1 Cert	Compliance	Engine/Treatment Plant: 2nd ROP Semiannual Report pursuant to MI-ROP-N3294-2019 received on time and properly certified. No issues were noted.
09/18/2024	MACT (Part 63)	Compliance	Semiannual Report pursuant to 40 CFR 63 Subpart AAAA. Received on time and complete. Plant 1 had 10 shutdowns and plant 2 had 23 shutdowns. The landfill's enclosed flare operated during these shutdowns.
09/17/2024	ROP Semi 1 Cert	Compliance	Landfill: 1st ROP Semiannual Report (2024) pursuant to MI-ROP-N3294-2024 received on time and properly certified (hardcopy 9/4/24, electronic 9/3/24). During the reporting period, there was one deviation reported for a single time period of missing data (1hr 24 minutes) due to a system malfunction that occurred on 6/25/24. The flare was not operating during this time period and the unit resumed recording once the issue was resolved.

Activity Date	Activity Type	Compliance Status	Comments
09/17/2024	MACT (Part 63)	Compliance	Semiannual report pursuant to 40 CFR Part 63 Subpart AAAA in lieu of annual reporting required by 40 CFR 60 Subpart XXX since the facility complies with the operational provisions of 63.1958, 63.1960, and 63.1961. Received on time (hardcopy 9/4/24, electronic 9/3/24). Monitoring and Exceedances (63.1981(h)(1)) – 21 zero or positive pressure exceedance which were corrected as required; Diversion of gas (63.1981(h)(2)) - None; Control Device Downtime (63.1981(h)(3)) – 2 downtimes for maintenance. Total downtime was 0.77 hours; Collection System Downtime (63.1981(h)(4)) – Same as control system downtime; Surface Emissions Monitoring (63.1981(h)(5)) – 13 exceedances in the 2nd quarter and 3 in the 3rd quarter, all were corrected within 30 days; System Expansions (63.1981(h)(6)) – 2 new leachate collectors were installed as well as new or upgraded ancillary equipment (vacuum lines, liquid removal components); Corrective Action/Root Cause Analysis (63.1981(h)(7)) – Not required since all exceedances were corrected within 15 and 60 days; Enhanced Monitoring (63.1981(h)(8)) - Not required.
09/17/2024	NSPS (Part 60)	Compliance	Annual Liquids Addition Reporting pursuant to 40 CFR 60 Subpart XXX - Hardcopy received 9/9/2024 and the electronic copy received 9/5/2024. No leachate recirculated.
08/21/2024	On-site Inspection	Compliance	FY '24 inspection to determine compliance status with respect to MI-ROP-N3294-2024 and any other applicable air quality rules and regulations.

Activity Date	Activity Type	Compliance Status	Comments
07/23/2024	ROP Semi 1 Cert	Non Compliance	Postmarked 9/15/23. Semi Annual certification received on time and properly certified. One deviation was reported due to nine releases of treated LFG to the atmosphere. It was estimated that each event lasted for no more than 5 minutes and the cause was determined to be due to residual amounts of oxygen in the treated LFG within the pipe between the treatment system and engines. This has since been fixed.
07/23/2024	MACT (Part 63)	Non Compliance	Postmarked 9/15/23. Semiannual Report pursuant to 40 CFR 63 Subpart AAAA. The facility is listing this report as an NSPS XXX report. However, the source is both the landfill and engine plant, and the landfill has opted to comply with the more stringent semiannual reporting pursuant to 40 CFR Part 63 Subpart AAAA in lieu of annual reporting required by 40 CFR 60 Subpart XXX since the facility complies with the operational provisions of 63.1958, 63.1960, and 63.1961. Therefore, since this is being identified as a SA report and not an annual NSPS report and because the landfill has opted to comply with the NESHAP SA requirements this report is being accepted as a NESHAP AAAA report for the treatment/engine plant and is supplemental to the Landfill's NESHAP AAAA report. Plant 1 shut down 21 times with durations ranging from 0.3 hours to 12.5 hours while Plant 2 shut down 28 times with durations ranging from 0.2 hours to 17.8 hours. The facility identified 9 instances when treated landfill gas was released to the atmosphere due to residual high oxygen. It was estimated that each event lasted for no more than 5 minutes. This has since been fixed.

Activity Date	Activity Type	Compliance Status	Comments
07/18/2024	Stack Test	Compliance	Stack test report for Engine No. 7 and EUOPENFLARE testing conducted on May 7, 2024. Engine testing conducted per NSPS JJJJ and the following results were reported for Engine 7: NOX = 0.68 g/bhp-hr (3.0 limit), CO = 3.09 g/bh-hr (limit 5.0 g/bh-hr), and VOCs (not including HCOH) = 0.13 g/bhp-hr (limit 1.0 g/bhp-hr). The average output was 1,542 kW which is within 10% of the engine's max capacity of 1,600 kW. Average methane content was 53.8%. The enclosed flare was tested per NSPS XXX & NESHAP AAAA. There were no visible emission reported (limit is < 5 minutes of VE over 30 minutes), the average net heating value of the gas being combusted was 19.89 mega joules per cubic meter (limit is 7.45 MJ/m3 or greater), and the average exhaust gas exit velocity was 10.61 ft/sec (limit is < 60 ft/sec). The average gas flow rate was 499.9 cfm. Testing of both the engine and flare appear to show compliance with the limits.
04/30/2024	ROP Annual Cert	Non Compliance	Engine/Treatment Plant: 2023 Annual Compliance Certification pursuant to MI-ROP-N3294-2019 received on time and properly certified. A total of 17 instances occurred when treated landfill gas was released to the atmosphere due to residual high oxygen. These have been reported in the appropriate SA reports.

Activity Date	Activity Type	Compliance Status	Comments
04/30/2024	MACT (Part 63)	Non Compliance	<p>Semiannual Report pursuant to 40 CFR 63 Subpart AAAAA. The facility is listing this report as an NSPS XXX report. However, the source is both the landfill and engine plant, and the landfill has opted to comply with the more stringent semiannual reporting pursuant to 40 CFR Part 63 Subpart AAAAA in lieu of annual reporting required by 40 CFR 60 Subpart XXX since the facility complies with the operational provisions of 63.1958, 63.1960, and 63.1961. Therefore, since this is being identified as a SA report and not an annual NSPS report and because the landfill has opted to comply with the NESHAP SA requirements this report is being accepted as a NESHAP AAAAA report for the treatment/engine plant and is supplemental to the Landfill's NESHAP AAAAA report. Plant 1 shut down 12 times with durations ranging from 0.9 hours to 24 hours while Plant 2 shut down 22 times with durations ranging from 0.5 hours to 38.3 hours. The landfill tracks downtimes that occurred when both the Landfills flare and the engine plants treatment system are down simultaneously. Those have been noted in the Landfill's SA Reports. During the 1st half of 2023 the facility identified 13 instances when treated landfill gas was released to the atmosphere due to residual high oxygen. This issue continued into the 2nd half of 2023 with an additional 4 events that occurred on 8/25/23, 10/16/23, 11/1/23, and 11/9/23. The facility estimates that each event lasted for no more than 5 minutes.</p>
04/30/2024	Annual Emissions Report (or MAERS)	Compliance	<p>Report certification verifying submittal of MAERS. No changes made to database as submitted. (CR 4/30/24)</p>

Activity Date	Activity Type	Compliance Status	Comments
04/30/2024	ROP SEMI 2 CERT	Non Compliance	Engine/Treatment Plant: 2nd ROP Semiannual Report pursuant to MI-ROP-N3294-2019 received on time and properly certified. During the 1st half of 2023 the facility identified 13 instances when treated landfill gas was released to the atmosphere due to residual high oxygen. This issue continued into the 2nd half of 2023 with an additional 4 events that occurred on 8/25/23, 10/16/23, 11/1/23, and 11/9/23. The facility estimates that each event lasted for no more than 5 minutes and that these issues were previously reported under the 1st half SA report, which was not possible since they occurred after the 1st SA report was submitted. This will be discussed with the facility and a VN will be issued for venting treated landfill gas.
04/30/2024	Annual Emissions Report (or MAERS)	Compliance	Report Certification verifying submittal of MAERS. No changes made to database as submitted. (CR 4/30/24)
04/19/2024	MACT (Part 63)	Compliance	Plant: Semiannual Report pursuant to 40 CFR 63 Subpart ZZZZ. Received on time and properly certified. No issues reported.

Activity Date	Activity Type	Compliance Status	Comments
04/19/2024	MACT (Part 63)	Compliance	Semiannual report pursuant to 40 CFR Part 63 Subpart AAAA in lieu of annual reporting required by 40 CFR 60 Subpart XXX since the facility complies with the operational provisions of 63.1958, 63.1960, and 63.1961. Monitoring and Exceedances (63.1981(h)(1)) – 1 zero or positive pressure exceedance which was corrected as required (3 days); Diversion of gas (63.1981(h)(2)) - None; Control Device Downtime (63.1981(h)(3)) – 10 downtimes for maintenance and one for loss of power. Max downtime was 1.75 hours; Collection System Downtime (63.1981(h)(4)) – Same as control system downtime; Surface Emissions Monitoring (63.1981(h)(5)) – 7 exceedances in the 3rd quarter and 2 in the 4th quarter, all were corrected within 10 days; System Expansions (63.1981(h)(6)) – None; Corrective Action/Root Cause Analysis (63.1981(h)(7)) – Not required since all exceedances were corrected within 15 days; Enhanced Monitoring (63.1981(h)(8)) - Not required.
04/19/2024	ROP SEMI 2 CERT	Compliance	Landfill: 2nd ROP Semiannual Report (2023) pursuant to MI-ROP -N3294-2019 received on time and properly certified. During the reporting period, there was one deviation reported for a single time period of missing data (> 15 min) due to a loss of power. This occurred on 8/23/23 and lasted 26 minutes. The flare was not operating during this time period. Unit resumed recording once power was restored.
04/19/2024	ROP Annual Cert	Compliance	Landfill: 2023 Annual ROP Certification received on time and properly certified. The 2 deviations noted in the Semi-annual Report for two 15 minute periods of missing data have been included.
03/11/2024	ROP R215 Notification	Compliance	The new Responsible official is Raymond Ivers, President of Operations.
10/13/2023	NSPS (Part 60)	Compliance	Annual Liquids Addition Reporting pursuant to 40 CFR 60 Subpart XXX - No leachate recirculated.

Name:



Date:

9/18/2024

Supervisor:

