

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Granger Wood Street Landfill	SRN : N5997
Location : 16980 Wood Road Granger Waste Services, Inc.	District : Lansing
	County : CLINTON
City : LANSING State: MI Zip Code : 48906	Compliance Status : Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 8/19/19	FCE Completion Date : 9/18/2020
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/19/2020	Scheduled Inspection	Compliance	Scheduled, announced inspections of Granger Wood St Landfill, Granger Container Service, and EDL generating station to determine compliance with NSPS requirements as well as MI-ROP-N5997-2013
08/19/2020	Self Initiated Inspection	Compliance	Abbreviated SEM Survey conducted by AQD staff, Mike Kovalchick.

Activity Date	Activity Type	Compliance Status	Comments
08/05/2020	NSPS (Part 60)	Compliance	<p>Semi-annual report for the GCCS for EULANDFILL and the emission units EUACTIVECOLL, EUTREATMENTSYS, and EUOPENFLARE (emission units in current draft ROP MI-ROP-N5997-XXXX) for compliance with the NSPS Subpart WWW and NESHAP AAAA. Covers 1/21/19 - 6/30/19 (Granger began complying with the NSPS on 1/21/2019). Keith Granger certified as RO.</p> <p>EULANDFILL 1st and 2nd quarter surface monitoring for methane on 3/11/19 and 5/20/19 - 5/21/19; 1 exceedance at 790 ppm for Q1, with appropriate 10- and 30-day rechecks passing, conducted according to ROP requirements, using 90% of stabilized reading. No exceedances detected during Q2.</p> <p>GCCS EUACTIVECOLL: All O2, Temperature or pressure exceedances have been addressed throughout the reporting period via monthly reports and requests for an ACT when exceedances could not be corrected within the 15-day time-frame.</p> <p>EUTREATMENT, EUOPENFLARE: No periods of of control device downtime exceeding 1 hour were reported.</p>
08/05/2020	ROP Semi 1 Cert	Compliance	<p>Reporting period 1/1/2019 to 6/30/2019 under MI-ROP-N5997-2013 for EDL Wood Street (generating station). 1 deviations were reported: 7 hours of kW output and landfill gas usage data loss due to power loss to CMS device - EDL lost power due to transformer blowing out. Certified by Dan Zimmerman, EDL's Responsible Official.</p>
08/05/2020	ROP SEMI 2 CERT	Compliance	<p>Semi-annual report certification indicates EDL (Section 3 of proposed ROP and Section 1 of MI-ROP-N5997-2013) has been in compliance for the time period 7/1/19 to 12/31/2019 under MI-ROP-N5997-2013. No deviations reported. Dan Zimmerman certified as Responsible Official.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/05/2020	ROP Annual Cert	Compliance	Annual certification report indicates EDL(Section 3 of proposed MI-ROP-N5997-20XX, Section 1 of MI-ROP-N5997-2013) has been in compliance for the time period 1/1/2019 to 12/31/2019 under MI-ROP-N5997-2013, except for the following deviation: 7 hours of kW and landfill gas usage continuous data due to power loss from a transformer being blown during 1st semi-annual period. Dan Zimmerman certified as Responsible Official.
08/05/2020	MACT (Part 63)	Compliance	MACT Subpart ZZZZ Annual Report for EDL at Wood Street (Section 3 of proposed ROP). 3 CAT G3520 IC engines and 4 CAT 3516 engines. Average fuel use for each engine was 425-525 scfm, 51% methane. Engines only burn landfill gas, meeting the req'ment to have a heat input of landfill gas at 10% or more of total fuel consumption. kW and landfill gas usage recordkeeping missing for 7 hours due to loss of power from lost transformer. Certified by Dan Zimmerman, authorized representative.
08/04/2020	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction semi-annual report per NESHAP subpart AAAA (MACT Part 63) for EDL engines. 28 start-up, 12 shutdown, and 16 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were certified to be consistent with SSM plan. Certified by Responsible Official Dan Zimmerman.

Activity Date	Activity Type	Compliance Status	Comments
05/15/2020	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction report per NESHAP subpart AAAAA (MACT Part 63) for MI-ROP-N5997-2013 Section 1 of ROP. 4 start-up, 2 shutdown, and 2 malfunction events were documented. Specific events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Todd Granger
05/15/2020	NSPS (Part 60)	Compliance	<p>2nd Semi-annual report for the GCCS (includes what will be EULANDFILL (landfill), EUACTIVECOLL (GCCS), and EUOPENFLARE of draft MI-ROP-N5997-20XX).</p> <p>EULANDFILL quarterly surface emission monitoring for methane (8/6/19 & 11/6/19) - there was 1 exceedance of the 500 ppm surface methane limit in the 3rd quarter, with 10 and 30-day rechecks in compliance. There were 3 locations of exceedances of the 500 ppm surface methane limit in the 4th quarter with 10 and 30-day rechecks in compliance for each location.</p> <p>GCCS EUACTIVECOLL: All O2, Temperature or pressure exceedances have been addressed throughout the reporting period via monthly reports and requests for an ACT when exceedances could not be corrected within the 15-day time-frame.</p> <p>EUOPENFLARE: 0 instances of control device (treatment system or open flare) downtime (for wellfield maintenance) that exceeded 1 hour, nor 3-hr averages where there was at least 1 hour of invalid data. Certified by Todd Granger, Responsible Official</p>
05/15/2020	ROP Annual Cert	Compliance	Annual certification report indicates Granger Container Service has been in compliance for the time period 1/1/2019 to 12/31/2019 under MI-ROP-N5997-2013. No deviations reported. Todd Granger certified as Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
05/15/2020	ROP Annual Cert	Compliance	Annual certification report indicates the Wood Street Landfill and Granger Container Service (Sections 1 & 2 of draft MI-ROP-N5997-20XX) has been in compliance for the time period 1/1/2019 to 12/31/2019 under MI-ROP-N5997-2013. No deviations reported. Todd Granger certified as Responsible Official.
05/08/2020	ROP SEMI 2 CERT	Compliance	Semi-annual report certification indicates that Wood Street Landfill and Granger Container Service has been in compliance for the time period 7/1/19 to 12/31/2019 under MI-ROP-N5997-2013. No deviations reported. Todd Granger certified as Responsible Official. (Section 1 & 2 of draft ROP)
05/08/2020	MAERS	Compliance	2019 MAERS received electronically for all sections. EDL MAERS cert hard copy received 3/16/20, certified by Dan Zimmerman. See MAERS for any review comments
05/08/2020	MAERS	Compliance	Hard copy 2019 MAERS Report. Section 1 - Granger Landfill. Certified by Todd Granger, Responsible Official.
05/08/2020	MAERS	Compliance	Hard copy 2019 MAERS Report. Section 2 - Granger container Service. Certified by Todd Granger, Responsible Official
04/21/2020	Stack Test	Compliance	Emissions testing per MI-ROP-N5997-2013. Testing conducted on March 3-4, 2020 on EUICEENGINE1-S1 (engine 5), EUICEENGINE2-S1 (engine 6), and EUICEENGINE3-S1 (engine 7) for NOX, CO and VOC. Report from Impact indicates compliance with permit limits for all pollutants (CO, NOx, VOC) for all engines tested while operating under maximum routine operating conditions (within 10% of its maximum capacity). The stack test report Executive Summary process data are within the parameter ranges I recorded during the stack test. Certified by Dan Zimmerman, Responsible Official. Hard copy of test report received 7/9/20

Activity Date	Activity Type	Compliance Status	Comments
03/03/2020	Stack Test Observation	Compliance	Stack test observation of Engine 6 (EUIECEENGINE2-S1) testing for NOx, CO and VOC during the March 3-4, 2020 testing of EUIECEENGINE1-3
12/26/2019	ROP R215 Notification	Compliance	R 215 Responsible Official Change notification for the Granger Wood Street Landfill. Change from Ralph Nuerenberg to Keith Granger as the responsible official: Mr. Keith Granger, CFO, Granger Waste Services, 16890 Wood Rd., Lansing, MI 48906
11/07/2019	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5997-2013 for EULANDFILL of ROP. 9 start-up, 8 shutdown, and 1 malfunction event were documented. A statement was made that actions taken at facility for all SSM events were consistent with the SSM plan. Startup and shutdown events of the flare are typically due to diversion of the gas to or from the flare to the electric plant. 1 malfunction was associated with the plant down due to liquid intake. Certified by Responsible Official Keith Granger, CFO.
11/07/2019	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Certification for Granger Wood St Landfill & Granger Container Service (Section 1 of MI-ROP-N5997-2013; Sections 1 and 2 of Draft MI-ROP-N5997-XXXX). No deviations reported for 1/1/2019 - 6/30/19 reporting period for MI-ROP-N5997-2013 report includes NSPS Subpart WWW and MACT Subpart AAAA compliance beginning 1/21/19. No deviations were reported for the requirements currently in MI-ROP-N5997-2013. Keith Granger, CFO, signed as Responsible Official

Name: Michelle Luplow Date: 9/30/20

Supervisor: B.M. e text here