

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 : Non Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 8/19/21	FCE Completion Date : 8/19/2022
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/19/2022	On-site Inspection	Non Compliance	Onsite inspections of the Granger Wood Street Landfill and EDL RNG Plant to determine compliance with MI-ROP-N5997-2020a, PTI 178-19 and PTI 177-19A.
07/27/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (June 2022) including MAP recordkeeping as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). June H2S sample results reported (sampled 6/8/22) indicate a TRS value of non-detect levels of TRS and H2S. Electronic copy received 7/27/22. Hard copy rec'd 7/26/22
07/27/2022	ROP Monthly	Compliance	Monthly Progress Report (June 2022) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions, H2S gas sampling). Report indicates compliance with the 12-month rolling FGRNG&NEWFLARES SO2 emissions limit of 35.9 tpy at 9.4 tons. Rec'd electronically 7/27/22. Hard copies rec'd 7/26/22.

Activity Date	Activity Type	Compliance Status	Comments
06/29/2022	ROP Monthly	Compliance	Monthly Progress Report (May 2022) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions, H2S gas sampling). Report indicates compliance with the 12-month rolling FGRNG&NEWFLARES SO2 emissions limit of 35.9 tpy at 9.2 tons. Rec'd electronically 6/29/22. Hard copies rec'd 6/29/22.
06/29/2022	CO/CJ	Compliance	Supplemental Environmental Project Update - Final Status Report, One Year of Growth. Success Rate of Trees & Maintenance Performed. All trees planted and all trees survived except for 1 tree planted in Location 1. Nash Nurseries to replace the dead tree in July 2022.
06/29/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (May 2022) including MAP recordkeeping as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). May H2S sample results reported (sampled 5/18/22) indicate a TRS value of 4.8 ppm and H2S at non-detect. Electronic copy received 6/29/22. Hard copy rec'd 6/29/22

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06/24/2022	MACT (Part 63)	Compliance	<p>2021 2nd Semi-annual report for the GCCS (includes EULANDFILL, EUACTIVECOLL, EUOPENFLARE, EUUF1 & EUUF2). Report represents compliance with Part 62 Subpart OOO, Part 63 Subpart AAAA EULANDFILL quarterly surface emission monitoring for methane (August 2021 and November 2021) - there were 3 exceedances of the 500 ppm surface methane limit in the 3rd quarter, with 10 and 30-day rechecks in compliance. There were 5 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: No wells show greater than 131F prior to September 27, 2022 and no wells showed greater than 145F after September 27, 2022. Positive pressures occurred at several wells, but all were corrected within 15 days.</p> <p>Certified by Todd Granger, Responsible Official</p>
06/24/2022	ROP SEMI 2 CERT	Compliance	<p>2nd Semi-annual Compliance Report 2021. Sem-annual report indicates 4 deviations occurred: a total of 1.5 hours of continuous operating hours data was not monitored and recorded due to malfunctions of the recorder. Rocky Tondo certified as Responsible Official</p>
06/24/2022	MACT (Part 63)	Compliance	<p>2021 2nd Semi-Annual EUTREATMENTSYS report. Certified for 7/1/21 - 12/31/21 under MI-ROP-N5997-2020 by Rocky Tondo, Responsible Official. There were 12 periods of treatment system down time total.</p>
06/24/2022	ROP Other	Compliance	<p>EUTOX Annual Report required under PTI 178-19. All required information was reported as necessary.</p>

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06/24/2022	Stack Test	Compliance	Test Report for EUTOX thermal oxidizer (PTI 178-19) NOx and CO retest. Retesting was conducted on 6/8/22 to determine NOx and CO emissions. See 6/8/22 stack test observation report for add'l details. Test report indicates compliance with NOx and CO lb/MMBTU emission limits.
06/08/2022	Stack Test Observation	Compliance	EUTOX retest stack test observation.
06/07/2022	ROP Monthly	Compliance	Monthly Progress Report (April 2022) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions, H2S gas sampling). Report indicates compliance with the 12-month rolling FGRNG&NEWFLARES SO2 emissions limit of 35.9 tpy at 9.2 tons. Rec'd electronically 5/30/22. Hard copies rec'd 6/6/22.
06/07/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (April 2022) including MAP recordkeeping as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). April H2S sample results reported in under 4/25/22 submittal. Sample data indicates TRS is at 1.1 ppm, H2S at 0 ppm in April 2022. Electronic copy received 5/30/22. Hard copy rec'd 6/6/22
05/02/2022	ROP Monthly	Compliance	Monthly Progress Report (March 2022) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions, H2S gas sampling). Report indicates compliance with the 12-month rolling FGRNG&NEWFLARES SO2 emissions limit of 35.9 tpy at 9.2 tons. Rec'd electronically 4/25/22. Hard copies rec'd 4/29/22.

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04/30/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (March 2022) including MAP recordkeeping as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). Sample was taken 4/11/22, test results received 4/15/22. Sample data indicates TRS is at 1.1 ppm, H2S at 0 ppm. Electronic copy received 4/25/22. Hard copy rec'd 4/30/22.
04/26/2022	Stack Test	Compliance	Test Report for EUTOX thermal oxidizer (PTI 178-19). Testing was conducted on 2/22/22 to determine NOx, CO, and SO2 emissions. See 2/22/22 stack test observation report for add'l details. SO2 is within permitted limits. NOx and CO will be retested due to a meter flow error. Electronic copy rec'd 4/25/22. Hard copy rec'd 4/22/22.
04/06/2022	Complaint Investigation	Compliance	Complaint investigation in response to complaint received through online complaint form on 4/6/22.
03/31/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (February 2022) as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). Sample was taken 3/15/22, test results received 3/24/22. Sample data indicates TRS is at 1.1 ppm, H2S at 0 ppm. Electronic copy received 3/29/22. hard copy rec'd 3/31/22.
03/30/2022	ROP Monthly	Compliance	Monthly Progress Report (February 2022) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions and H2S gas sampling). Report indicates compliance with the 12-month rolling FGRNG&NEWFLARES SO2 emissions limit of 35.9 tpy at 9.19 tons. Electronic copy rec'd 3/29/22, hard copy rec'd 3/31/22
03/25/2022	MAERS	Compliance	2021 MAERS received electronically on 3/24/22. Certification received 3/16/22, certified by Todd Granger. Audit completed on 5/19/22. See MAERS for audit comments.

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03/25/2022	MAERS	Compliance	2021 MAERS received electronically on 3/24/22. Certification received 3/16/22, certified by Rocky Tondo. Audit completed on 5/19/22. See MAERS for audit comments.
03/25/2022	MAERS	Compliance	2021 MAERS received electronically on 3/24/22. Certification received 3/16/22, certified by Todd Granger. Audit completed on 5/19/22. See MAERS for audit comments.
03/22/2022	ROP Annual Cert	Compliance	Annual certification report for EDL (Section 3) under MI-ROP-N5997-2020. Annual report indicates 4 deviations occurred: a total of 1.5 hours of continuous operating hours data was not monitored and recorded due to malfunctions of the recorder. Rocky Tondo certified as Responsible Official.
03/22/2022	MACT (Part 63)	Compliance	MACT Subpart ZZZZ Annual Report for EDL at Wood Street (Section 3). All engines were decommissioned by 8/31/21. Certification for MI-ROP-N5997-2020, 3 CAT G3520 IC engines and 4 CAT 3516 engines. Average fuel use for each engine was 246-471 scfm, 52% 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. Continuous kW data, operating hours data, and landfill gas usage recordkeeping missing for a total of 1.5 hours. Certified by Rocky Tondo, Responsible Official
03/22/2022	ROP Other	Compliance	EUTOX annual certification report required under PTI 178-19. Report includes all required information, as necessary.
03/22/2022	ROP R215 Notification	Compliance	Rocky Tondo is certified as the new Responsible Official for EDL, effective 2/14/2022.

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03/22/2022	MACT (Part 63)	Compliance	<p>2nd Semi-annual report for the GCCS for EULANDFILL, EUACTIVECOLL, EUOPENFLARE, EUUF1, and EUUF2 for compliance with the NESHAP AAAA and Part 62 OOO. Todd Granger, Secretary, certified as RO. Electronic rec'd 3/15/22, hard copy rec'd 3/18/22.</p> <p>EULANDFILL 1st and 2nd quarter surface monitoring for methane on 8/10 - 8/11/21 and 11/2 & 11/4/21; 3 exceedances of 500 ppm were detected in the first quarter, 5 exceedances of 500 ppm surface methane detected for 2nd quarter. All exceedances addressed per requirements.</p> <p>GCCS EUACTIVECOLL: All O2, Temperature or pressure exceedances have been addressed throughout the reporting period within the 15-day time-frame.</p> <p>All flare and treatment system downtimes were reported</p>
03/21/2022	ROP SEMI 2 CERT	Compliance	<p>Semi-annual report certification indicates that Wood Street Landfill has been in compliance for the time period 7/1/21 to 12/31/2021 under MI-ROP-N5997-2020 (Section1). No deviations reported. Granger also certified compliance with Part 62 Subpart OOO and MACT AAAA. Todd Granger certified as Responsible Official.</p>
03/21/2022	ROP SEMI 2 CERT	Compliance	<p>Semi-annual report certification indicates that Granger Container Service has been in compliance for the time period 7/1/21 to 12/31/2021 under MI-ROP-N5997-2020 (Section 2). No deviations reported. Todd Granger certified as Responsible Official.</p>

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03/21/2022	ROP Annual Cert	Compliance	Annual certification report indicates the Wood Street Landfill (Section 1 of MI-ROP-N5997-2020) has been in compliance for the time period 1/1/2021 to 12/31/2021. No deviations reported. Company also certified compliance with Subpart OOO and MACT AAAA. Todd Granger certified as Responsible Official.
03/21/2022	ROP Annual Cert	Compliance	Annual certification report indicates the Granger Container Service (Section 2 of MI-ROP-N5997-2020) has been in compliance for the time period 1/1/2021 to 12/31/2021. No deviations reported. Todd Granger certified as Responsible Official.
03/21/2022	MACT (Part 63)	Compliance	2nd Semi-Annual Granger Landfill Start up, Shut down, and malfunction report per NESHAP subpart AAAA (MACT Part 63). Covers through 9/26/21 (Granger plans to comply with new MACT AAAA starting 9/27/21 which does not require SSM). 33 start-up, 31 shutdown, and 2 malfunction event were reported. Specific events are included in the SSM event report, which is maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Todd Granger, Secretary.
03/09/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (January 2022) as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). Sample was taken 1/17/22, test results received 2/2/22. Sample data indicates TRS is at 0.85 ppm, H2S at 0 ppm. Electronic copy of sample chain of custody received 1/28/22. Electronic copy rec'd 2/28/22. hard copy rec'd 3/4/22.

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03/06/2022	ROP Monthly	Compliance	Monthly Progress Report (January 2022) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions and H2S gas sampling). Report indicates compliance with the 12-month rolling SO2 emissions limit of FGRNG&NEWFLARES 35.9 tpy at 8.69 tons. Electronic copy rec'd 2/28/22, hard copy rec'd 3/4/22
02/22/2022	Stack Test Observation	Compliance	Stack test observation on EUTOX - EDL Energy (Section 3)
02/16/2022	ROP R215 Notification	Compliance	NESHAP AAAA Opt-In for EDL (Section 3 of MI-ROP-N5997-2020). EUTREATMENTSYS, owned and operated by EDL, is subject to the NESHAP Subpart AAAA and 40 CFR Part 62, Subpart OOO. Opt-in allows for EDL to comply with NESHAP Subpart AAAA in lieu of some of the requirements contained in Part 62 Subpart OOO.
02/04/2022	ROP Monthly	Compliance	Monthly Progress Report (December 2021) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions and H2S gas sampling). Report indicates compliance with the 12-month rolling SO2 emissions limit of FGRNG&NEWFLARES 35.9 tpy at 6.5 tons. Gas lab sample taken on 1/17/22, awaiting lab results. Electronic copy rec'd 1/28/22, hard copy rec'd 2/4/22
02/04/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (December 2021) as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). Sample was taken 1/17/22, test results received 2/2/22. Sample data indicates TRS is at 0.85 ppm, H2S at 0 ppm. Electronic copy of sample chain of custody received 1/28/22, electronic copy of test results received 2/2/22. hard copy rec'd 2/4/22.

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01/21/2022	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (November 2021) as required under Consent Order AQD No 2021-05 9C (H2S sampling records or gas chromatograph). Sample data indicates TRS is at 6.3 ppm. Electronic copy rec'd 12/23/21, hard copy rec'd 12/28/21.
01/14/2022	ROP Monthly	Compliance	Monthly Progress Report (November 2021) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions and H2S gas sampling). Report indicates compliance with the 12-month rolling SO2 emissions limit of FGRNG&NEWFLARES 35.9 tpy (4.1 tons). Gas lab sample data indicates TRS is over the 5 ppm limit at 6.3 ppm (H2S nondetect <1 ppm). Weekly testing not conducted - working with EDL to resolve. Electronic copy rec'd 12/23/21, hard copy rec'd 12/28/21
12/22/2021	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (October 2021) as required under Consent Order AQD No 2021-05 9C (H2S records of sampling or gas chromatograph). Sample data indicates H2S at 4.2 ppm. Electronic copy rec'd 11/30/21, hard copy rec'd 12/3/21.
12/22/2021	ROP Monthly	Compliance	Monthly Progress Report (October 2021) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions and H2S gas sampling). Report indicates compliance with the 12-month rolling SO2 emissions limit of FGRNG&NEWFLARES 35.9 tpy (2.82 tons). Gas sample data indicates TRS at 4.2 ppm (H2S nondetect < 1 ppm) Electronic copy rec'd 11/30/21, hard copy rec'd 12/3/21

Activity Date	Activity Type	Compliance Status	Comments
12/22/2021	Stack Test	Compliance	Test Report for FGNEWFLARES (PTI 177-19) where testing was conducted on 11/4/21 to determine Visible Emissions, Net Heating Value of landfill gas, Stack gas velocity and volumetric flow rate. See 11/4/21 stack test observation report for add'l details. Electronic copy rec'd 12/16/21. Hard copy rec'd 12/21/21.
11/30/2021	Reg. Applicability Determination	Compliance	AQD Determination for MACT AAAA applicability to EUTOX
11/19/2021	ROP Monthly	Compliance	Monthly Progress Report (September 2021) as required under Appendix 2 of MI-ROP-N5997-2020, Schedule of Compliance (SO2 emissions and H2S gas sampling). Report indicates compliance with the 12-month rolling SO2 emissions limit of FGRNG&NEWFLARES 35.9 tpy (1.657 tons). H2S sample data indicates H2S at less than 1 ppm. Electronic copy received 10/29/21, hard copy received 11/2/21.
11/08/2021	CO/CJ	Compliance	November 5, 2021 SEP Status Report for tree plantings status at the end of the growing season, as required by Exhibit A of Consent Order AQD No. 2021-05 for EDL (ROP Section 3). A total of 150 trees was planted among Locations 1-4.
11/04/2021	Stack Test Observation	Compliance	Test observation for Method 22 VE readings and net heating value sampling per the requirements in PTI 177-19/19A for flares EUUF1 and EUUF2.
10/18/2021	CO/CJ	Compliance	Monthly H2S Sampling & H2S emissions Progress Report (September 2021) as required under Consent Order AQD No 2021-05 9C (H2S records of sampling or gas chromatograph). Sample data indicates H2S at less than 1 ppm.
10/15/2021	ROP Semi 1 Cert	Compliance	1st Semi-Annual Compliance Report for 2021 under MI-ROP-N5997-2020 for Section 1 Granger Wood Street. 6 deviations were reported for missing 5-day and 15-day rechecks on wells exceeding operating parameters. Certified by Todd Granger, Secretary.

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10/15/2021	ROP Semi 1 Cert	Compliance	1st Semi-Annual Compliance Report for 2021 Section 2 under MI-ROP-N5997-2020 for Granger Container Service. 0 deviations were reported. Certified by Todd Granger, Secretary.
10/13/2021	Malfunction Abatement Plan	Compliance	Electronic Copy received 10/8/21. Hard copy received 10/14/21. MAP for EUCONDYSYS and EUTOX (PTI 178-19) has been reviewed by AQD; however, there are additional items EDL needs to address in the MAP. Request for revised MAP sent to company 10/14/21. Final MAP was submitted to AQD via email on 2/22/22
10/07/2021	CO/CJ	Compliance	EDL is required to comply with AQD No 2021-05 9.D, which requires under EUCONDYSYS of PTI 178-19 that EUCONDYSYS shall not be operated until all RICE have permanently ceased operation. Notification submitted states RICE were made permanently inoperable on 8/30/21. Date of startup of EUCONDYSYS was 9/9/21.
10/07/2021	ROP Other	Compliance	Appendix 2-3 Schedule of Compliance requires all RICE engines be physically connected from the gas source before 10/1/21, and EDL is required to notify within 30 days from date of disconnection. Notification of disconnection received 9/24/21 for a disconnection date of 8/30/21.
10/06/2021	Other Non ROP	Compliance	Notifications for installation completion and startup of EDL's EUTOX and EUCONDYSYS per PTI 178-19 Reporting requirements. Installation and startup for both emission units reported to occur on 9/9/21. EDL RICE engines were rendered permanently inoperable on 8/30/21.

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09/22/2021	MACT (Part 63)	Compliance	1st Semi-Annual 2021 SSM report per NESHAP Subpart AAAAA (MACT Part 63) for EDL (Section 3). 18 start-up, 9 shutdown, and 9 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 authorized rep. Dan Zimmerman.
09/22/2021	NSPS (Part 60)	Compliance	1st Semi-Annual Report 2021 for EUTREATMENTSYS under NSPS Subpart WWW. 14 periods where the treatment system was down for 1+ hours. No free venting of LFG during any downtime period.
09/17/2021	ROP Semi 1 Cert	Compliance	1st Semi-Annual Report Section 3. Reporting period 1/1/2021 to 6/30/2021 under MI-ROP-N5997-2020 for EDL Wood Street (generating station). 0 deviations were reported. Certified by Dan Zimmerman, EDL's authorized representative.

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09/13/2021	NSPS (Part 60)	Compliance	<p>1st Semi-annual report for the GCCS for EULANDFILL and the emission units EUACTIVECOLL and EUOPENFLARE for compliance with the NSPS Subpart WWW and NESHAP AAAA. Todd Granger, Secretary, certified as RO.</p> <p>EULANDFILL 1st and 2nd quarter surface monitoring for methane on 3/17 and 5/27/2021; 2 exceedances of 500 ppm were detected in the first quarter, and addressed per ROP requirements. No exceedances of 500 ppm surface methane detected for 2nd quarter.</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. AOP requests are currently pending for all leachate collectors. EUOPENFLARE: No periods of control device downtime exceeding 1 hour were reported.</p>
09/13/2021	MACT (Part 63)	Compliance	<p>1st Semi-Annual Granger Landfill Start up, Shut down, and malfunction report per NESHAP subpart AAAA (MACT Part 63). 7 start-up, 2 shutdown, and 7 malfunction event were reported. Specific events are included in the SSM event report, which is maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Todd Granger, Secretary.</p>
08/30/2021	Other Non ROP	Compliance	<p>PTI 177-19 requires notification for completion of installation of FGNEWFLARES. Notification indicates installation was complete on 8/30/21.</p>

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08/30/2021	ROP R215 Notification	Compliance	Rule 215 Notification for Granger Wood Street Landfill. Electronic notification received 8/30/21. Hard copy received 9/3/21. As of September 27, 2021, Granger Wood Street Landfill plans to comply with the MACT Subpart AAAA, relieving the company's responsibility to comply with the NSPS Subpart WWW, which is currently in their ROP.

Name: Michelle Luplow Date: 9/27/22

Supervisor: RB