



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

October 23, 2024

VIA EMAIL

Paul Anderson, Chief Operating Officer & Vice President
Granger Wood Street Landfill
16980 Wood Road
Lansing, Michigan 48906

SRN: N5997, Clinton & Ingham County

Dear Paul Anderson:

VIOLATION NOTICE

On July 29, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Granger Wood Street Landfill located at 16980 Wood Road, Lansing, Michigan. The purpose of this inspection was to determine Granger Wood Street Landfill's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 177-19B; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N5997-2020a, Section 1.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGNEWFLARES	PTI No. 177-19B, Testing/Sampling SC V.1.a & Monitoring/Recordkeeping SC VI.6.	SO ₂ pph is not calculated according to Appendix A.
FGNEWFLARES	PTI No. 177-19B, Testing/Sampling SC V.1.a & Monitoring/Recordkeeping SC VI.5	Semi-annual raw landfill gas sampling using an EPA-approved method and laboratory analysis has not been conducted since 2020, therefore, there are no semi-annual gas sampling and analysis records for H ₂ S and TRS.
FGNEWFLARES	PTI No. 177-19B Monitoring/Recordkeeping SC VI.6	SO ₂ mass emission calculations are not

		calculated according to Appendix A.
Waste Shredders	R 336.1201	Waste shredders were operated without a PTI. Exemption demonstrations submitted were inadequate for demonstrating the process is exempt from the need to be permitted.

SO2 Recordkeeping

Records were reviewed for July 2022 – June 2024, for compliance with the SO2 pph limit. SO2 pph is required to be calculated according to Appendix A of PTI No. 177-19B, which includes, at a minimum, using weekly gas sampling data, the daily gas usage, the daily hours of operation, gas flow to the flare, and the ratio of TRS to H2S from the most recent semi-annual laboratory test. Granger, instead, calculated the SO2 pph emissions based on the maximum average TRS value (based on averaged TRS data gathered in calendar year 2020), and the maximum flow rate of both flares combined (6,000 scfm). This is a violation of FGNEWFLARES, Testing/Sampling SC V.1.a & Monitoring/Recordkeeping SC VI.6 of PTI No. 177-19B.

Granger Wood Street Landfill is required to sample the raw landfill gas semi-annually, by gas sampling, using an EPA-approved method and laboratory analysis. The records are required to be kept for H2S and TRS concentrations. I requested the semi-annual lab analysis results for calendar years 2020 through 2024. Granger could only provide records from 2020. This is a violation of FGNEWFLARES, Testing/Sampling SC V.1a and Monitoring/Recordkeeping SC VI.5 of PTI No. 177-19B.

Records were reviewed for July 2022 – June 2024, for compliance with the SO2 tons per 12-month rolling period. Records indicate that Granger calculates the monthly SO2 mass emission rate by using the volume of treated gas and the volume of raw landfills gas sent to the flares, and the monthly TRS value for each type of gas, which appears to be based on Draeger tube sampling data, and the 2020 H2S/TRS ratio established during calendar 2020. The SO2 tons on a monthly and 12-month rolling period were not calculated according to Appendix A of the PTI. This is a violation of FGNEWFLARES, Monitoring/Recordkeeping SC VI.6 of PTI No. 177-19B.

Rule 201: Waste Shredders

During this inspection, and in previous communications with the facility, it was noted that Granger Wood Street Landfill had commenced operation of an unpermitted waste shredding process at this facility. The first event occurred between December 19 – 21, 2023. The AQD staff was made aware of this event on December 18, 2023, and an exemption demonstration was requested at that time. The exemption demonstration was insufficient; however, Granger did not plan to do anymore waste shredding. During this inspection, the MMD and the AQD noted a waste shredder positioned at the landfill. Granger Wood Street Landfill staff provided an additional exemption demonstration (Rule 283) and a Rule 278 analysis. It is the AQD's professional judgement that Rule 283 is an inappropriate exemption for operating the waste shredder, and as such, operation of the waste shredder is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the waste shredder process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 13, 2024, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Michelle Luplow at EGLE, AQD, Lansing District, at 525 W. Allegan St., First Floor South, Lansing, Michigan 48933 or LuplowM1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Granger Wood Street Landfill believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Granger Wood Street Landfill.

Paul Anderson
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If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: Serenity Skillman, Granger
Steve Blayer, Granger
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE