

## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## FCE Summary Report

<b>Facility :</b>	SMITHS CREEK LANDFILL	<b>SRN :</b>	N6207
<b>Location :</b>	6779 SMITHS CREEK ROAD	<b>District :</b>	Warren
		<b>County :</b>	SAINT CLAIR
<b>City :</b>	SMITHS CREEK	<b>State:</b>	MI
<b>Zip Code :</b>	48074	<b>Compliance Status :</b>	Non Compliance
<b>Source Class :</b>	MAJOR	<b>Staff :</b>	Iranna Konanahalli
<b>FCE Begin Date :</b>	9/2/2022	<b>FCE Completion Date :</b>	9/27/2024
<b>Comments :</b>	Smiths Creek is NOT in compliance with ROP based upon four VNs. Two small (< 30 HP		

## List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/09/2024	On-site Inspection	Non Compliance	FY2024 ROP CMS scheduled inspection of Smiths Creek Landfill (Section 1 SCL) ("Landfill" or "Smiths Creek" or "SCL") located at 6779 Smiths Creek Road, Smiths Creek (Kimball), Michigan 48074-3506.
06/27/2024	Stack Test	Compliance	<p>Compliance Testing Report: FG-ICEENGINES NOX, CO, and NMOC Emissions for Engine 1 and Engine 2 (Blue Water Renewables, Inc).</p> <p>Blue Water Renewables (BWR) (N6207) FG-ICEENGINES (Engine1&amp;2): NSP 4J LFG Engines. Engine1 &amp; 2 NOx = 0.53 &amp; 0.55 &lt;&lt; 2.0, CO = 3.37 &amp; 2.59 &lt;&lt; 5.0 &amp; NMOC = = 0.0007 &amp; 0.0007 &lt;&lt; 1.0. All emissions rates in g/hp-hr compared against the corresponding limits of NSPS 4J. The results are based on RWDI Report # 2407206 dated June 03, 2024, sampled on April 25,2024.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/27/2024	Other Non ROP	Non Compliance	<p>Annual Liquids Addition Reporting; 40 CFR 62, Subpart 000 for ROP Permit Number MI-ROP-N6207-2018.</p> <p>Smiths Creek Landfill (SCL) (N6207): 2024 Annual Liquid Addition Report (ALAR) (40 CFR, Part 62, Subpart § 62.16726 Recordkeeping guidelines (i) RDDP Permit). Liquids added = 775,931 gallons/yr over surface area 41.1 acres with annual waste acceptance rate of 263,796 Mg / yr. ALAR report was sent via a letter dated June 21, 2024, Laura Niemann (Phone: 616-891-2592-Direct; Fax: NA; Cell: 248-787-4069; E-mail: LNiemann@eilLLC.com) of Environmental Information Logistics, LLC of Caledonia, MI 49316. Non-compliance with Rule 901 odor and MACT 4A.</p>
05/01/2024	Complaint Investigation	Non Compliance	FY 2023-24 Complaints: complaint investigations
04/06/2024	Other Non ROP	Compliance	<p>Semi-Annual Landfill Gas Treatment System Report.</p> <p>Blue Water Renewables (BWR) (N6207): Semi2 (Jul-Dec 2023) Semi2 deviation, SSM report, EU-TREATMENTSYS gas treatment. 6 outages of gas treatment system have occurred.</p>
04/05/2024	Annual Emissions Report (or MAERS)	Compliance	<p>ROP Certification for SLEIS submittal.</p> <p>Smiths Creek Landfill (SCL) (N6207): Annual (Jan-Dec 2023) MiEnviro Annual Emissions Cert.</p> <p>Blue Water Renewables (BWR) (N6207): Annual (Jan-Dec 2023) MiEnviro Annual Emissions Cert.</p>
04/05/2024	ROP SEMI 2 CERT	Compliance	<p>Semi Annual Certification. Smiths Creek Landfill (SCL) (N6207): Semi2 (Jul-Dec 2023) ROP deviation report. 2 deviations (nuisance odor, flow &amp; temperature meters for rental flare did not work. The meters replaced and reprogrammed.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/05/2024	MACT (Part 63)	Compliance	2nd Half 2023 Semiannual NESHAP Report. Smiths Creek Landfill (SCL) (N6207) ROP Cert Annual (July-Dec 2023). Smiths Creek Landfill (SCL) (N6207): Semi2 (Jul-Dec 2023) Landfill NESHAP 4A (Sec. 63.1981(h)) Certification. Control: 2 DTE engines, one 2-in-1 flare and one 400 CFM (to be upgraded to 1,000 CFM) portable flare. Well pressure exceeded (3). Temperature never exceeded 145 °F. Exceeded 5 times 500 ppm (1 on Aug 1-2 & 4 on Oct 19-2, 2023) Surface Standard plus EGLE detected 40 exceedances of 500 ppm (Oct 18, 2023). 14 incidents of gas collection system downtime. 14 control system downtimes. 14 collection system downtimes. 3 new wells added. Gas collection system does not provide sufficient vacuum at many wells.
04/04/2024	ROP Annual Cert	Non Compliance	Annual Certification. Smiths Creek Landfill (SCL) (N6207): Annual (Jan-Dec 2023) ROP Cert. Non-compliance. Nuisance odor and regulatory violations issued.
03/14/2024	Complaint Investigation	Non Compliance	Complaint investigation
02/29/2024	Complaint Investigation		Complaint Investigation
02/21/2024	Complaint Investigation	Non Compliance	FY 2023-24 Complaints: Smiths Creek Landfill (SCL) (N6207)
12/20/2023	Complaint Investigation	Non Compliance	Smiths Creek Landfill (SCL) (N6207): FY 2023-24 Complaints
12/20/2023	Complaint Investigation	Non Compliance	Smiths Creek Landfill (SCL) (N6207): FY 2023-24 Complaints

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12/14/2023	ROP R215 Notification	Compliance	Notification for one (1) additional solar vent flare. Notification of change in RO to Matthew B. Williams, Landfill Manager. BLUE WATER RENEWABLES (MI-ROP-N6207-2018): Maureen Bennett (Maureen Bennett maureen.bennett@dteenergy.com ) 313-548-8754) of DTE Biomass Energy filed a Rule 215 change notification that Douglas Ayers, Manager of Operations, is a responsible official.
09/13/2023	MACT (Part 63)	Compliance	1st Half 2023 Semiannual NESHAP Report. Smiths Creek Landfill (SCL) (MI-ROP-N6207-2018): On September 08, 2023 (timely), AQD received Semi1 (Jan-Jun 2023, Landfill NESHAP / MACT 4A). Wellhead pressure was exceeded 15 times. No well exceeded 145 ° F. No HOV approved. Exceeded 500 ppm once in the period (1Q2023: March 1-2, 2023).  Solar Flare Datalogger Malfunctions
07/06/2023	Other Non ROP	Compliance	Report on Annual Liquids Addition, 40 CFR 62, Subpart OOO. SMITHS CREEK LANDFILL (N6207): Liquids addition report dated June 21, 2023, per 40 CFR, Part 62, Subpart OOO. June 2022 thru May 2023 liquid addition =1,443,056 gallons (Septage), over 41.1 acres landfill area, where 5,137,394 Mg of total municipal waste is disposed of, at the current (Jun 2022- May 2023) annual rate of 256,703 Mg per Year.
03/21/2023	Malfunction Abatement Plan	Compliance	SMITHS CREEK LANDFILL (N6207) BWR (Sec. 2) Treatment Sys, Engine 1-2 Sem2 (Jul-Dec 2022) = 2 events for treatment sys., Annual (Jan-Dec 2022) BWR = Compliance, MAERS = Yes,

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03/21/2023	Other Non ROP	Compliance	Semi-Annual Landfill Gas Treatment System Report.  SMITHS CREEK LANDFILL (N6207) BWR (Sec. 2) Treatment Sys, Engine 1-2 Sem2 (Jul-Dec 2022) = 2 events for treatment sys., Annual (Jan-Dec 2022) BWR = Compliance, MAERS = Yes,
03/15/2023	Annual Emissions Report (or MAERS)	Compliance	MAERS Report Submission Smiths Creek Landfill (SCL) (N6207) MAERS-2022 PM10 = 3.46, NMOC = 23.62, CO = 15.95, NOx = 0.85, SO2 = 3.69 & VOC 9.28 tpy.
03/15/2023	ROP Annual Cert	Compliance	0 deviation Smiths Creek Landfill (SCL) (N6207) ROP Cert Annual (Jan-Dec 2022) = Compliance. NSPS WWW sunset and now subject to 40 CFR 62, OOO effective June 21, 2021, NESHAP 4A has been amended on March 26, 2020. NESHAP Semi2 (Jul-Dec 2022) Report. 500 ppm exceeded zero times. Semi2 (Jul-Dec 2022) = zero dev.
03/15/2023	ROP SEMI 2 CERT	Compliance	0 deviation Smiths Creek Landfill (SCL) (N6207) ROP Cert Annual (Jan-Dec 2022) = Compliance. NSPS WWW sunset and now subject to 40 CFR 62, OOO effective June 21, 2021, NESHAP 4A has been amended on March 26, 2020. NESHAP Semi2 (Jul-Dec 2022) Report. 500 ppm exceeded zero times. Semi2 (Jul-Dec 2022) = zero dev.

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03/15/2023	Annual Emissions Report (or MAERS)	Compliance	MAERS certification form received.
01/18/2023	Other	Compliance	US EPA RM22 stack test - Solar Vent Flare No. 7

Name: Isabella Marshall

Date: 09-27-2024

Supervisor: Joyce