

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : CENTRAL SANITARY LANDFILL	SRN : N2804
Location : 21545 CANNONSVILLE RD	District : Grand Rapids
	County : MONTCALM
City : PIERSON State: MI Zip Code : 49339	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : David Morgan
FCE Begin Date : 8/1/2016	FCE Completion Date : 9/11/2017
Comments :	

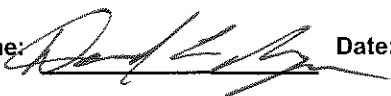
List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/31/2017	Scheduled Inspection	Non Compliance	
03/23/2017	MAERS	Compliance	ROP Certification form for MAERS received 3/14/17. It is noted that the NMOC emissions determined using LandGem for MAERS are different from NMOC emissions using LandGem for Tier II testing. For the MAERS calculation, a Potential Methane Generation Capacity of 100 m3/Mg was used in the model, for Tier II a Potential Methane Generation Capacity of 170 m3/Mg was used in the model. A lower Potential Methane Generation Capacity is acceptable for estimating emissions for inventory purposes. This MAERS is acceptable. -DLM
03/16/2017	ROP SEMI 2 CERT	Compliance	A deviation was reported for a computer malfunction that resulted in incomplete flare flame records for a period of 327 hours. The malfunction is being investigated.
03/16/2017	ROP Annual Cert	Compliance	ROP Number MI-ROP-N2804-2014. Original signature by responsible official. Deviations were identified for temperature monitor downtime which resulted in missing flare data.
02/14/2017	Reg. Applicability Determination		Tier II Applicability

Activity Date	Activity Type	Compliance Status	Comments
11/01/2016	ROP Semi 1 Cert	Compliance	Submittal had an original signature by the responsible official. Seven deviations during the reporting period occurred due to the flare temperature monitor not recording the temperature. The company identify is downloading the data more frequently to determine the extent of the problem. AQD staff will follow-up prior to the end of the second semi-annual reporting period.
09/30/2016	ROP Annual Cert	Compliance	ROP Number MI-ROP-N2804-2014. Original signature by responsible official. Deviations were identified for temperature monitor downtime which resulted in missing flare data.
09/30/2016	ROP SEMI 2 CERT	Compliance	A deviation was reported for a computer malfunction that resulted in incomplete flare flame records for a period of 138 hours. The malfunction was corrected after 6 days.

Activity Date	Activity Type	Compliance Status	Comments
09/13/2016	NSPS (Part 60)	Unknown	<p>Tier 2 Five year test report per Subpart WWW. After review of the Tier II Report it was determined that the calculation methodology used to determine the NMOC emission rate was not consistent with the NSPS, Subpart WWW. Under 40 CFR 60.754(a)(1), the NMOC emission rate is to be calculated using either the equation in 60.754(a)(1)(i) or 60.754(a)(1)(ii).</p> <p>However, in the Tier II report, the NMOC emission rate was calculated using the equation under 40 CFR 60.754(b) which is meant for determining when a collection and control system can be removed. It is noted that reference to an EPA Question and Answer document was provided to justify the use of this equation, however, in order to use the 60.754(b) equation as an alternate calculation method, a specific determination by USEPA to use this equation would be required.</p> <p>Therefore, in order to have an acceptable NMOC emission rate report, the NMOC emission rate should be recalculated using one of the equations in 60.754(a)(1) or Central Sanitary should have a determination from USEPA specifically allowing the use of the equation for the site. The company is seeking a determination from USEPA.</p>

Name:



Date:

9/14/17

Supervisor:

