



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 14, 2019

Mr. Justin Obermeyer, P.E., Environment Manager
Republic Services
21545 Cannonsville Road
Pierson, Michigan 49339

SRN: N2804, Montcalm County

Dear Mr. Obermeyer:

VIOLATION NOTICE

On February 4, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received revised emissions calculations for the Central Sanitary Landfill located at 21545 Cannonsville Road in Pierson, Michigan. These data revised previous Michigan Air Emission Reporting System (MAERS) information and was used to determine Central Sanitary 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 administrative rules; and Renewable Operating Permit (ROP) No. MI-ROP-N2804-2014.

Based on the review of the company's data, staff verified:

Process Description	Rule/Permit Condition Violated	Comments
EUOPENFLARE - 4,000 scfm open flare for control of the landfill gas.	Rule 201 (R 336.1201 – Permits to Install)	The information provided with the revised MAERS calculations demonstrate that actual emissions of sulfur dioxide (SO2) from the flare have increased from those evaluated during the original permit evaluation.

The flare was originally evaluated using the United States Environmental Protection Agency's *Compilation of Air Pollutant Emissions Factors (AP-42)*. The revised emissions calculations for MAERS were based on landfill gas samples that were collected in December 2016. Additional landfill gas sampling has demonstrated the sulfur concentration in the landfill gas as high as 700 parts per million which is above the AP-42 concentration of 46 parts per million and which results in SO2 emissions above the significance level defined in Rule 119(e).

At a minimum, this is a violation of Rule 201 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). A modification is defined by Rule 113(e) as "making a physical change in, or change in the method of operation of, existing process or process equipment which increases the amount of any air contaminant emitted into the outer air." A change in the gas is considered a "modification in the process" and therefore subject to the requirements of Rule 201(1).

Mr. Justin Obermeyer
Republic Services
Page 2
February 14, 2019

A program for compliance may include a completed Permit to Install application for the EUOPENFLARE. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page).

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 violation and submit a written response to this Violation Notice by March 7, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If you believe 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



David L. Morgan
Environmental Quality Specialist
Air Quality Division
616-356-0009

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ