

INSPECTION NARRATIVE

I arrived at the facility at 11:00 am and met with Mr. Stephen Smith. Together we discussed the process of the facility. We also discussed the ROP renewable process, as the facility currently has submitted a renewal application. I explained that during the renewal process, the facility will be reunited with Sauk Trails Landfill as one stationary source, operating in two separate sections. At this time, the ROP from Saul Trails will be assigned to both facilities, and the MAERS will be submitted as one report with two sections. During the inspection, the plant was operating properly and was producing acceptable gas. After explaining the process, we walked through the plant. The facility has a small natural gas generator that is used during emergency. The generator will power emergency lighting and controls so that the plant can gradually power down.

APPLICABLE RULES/PERMIT CONDITIONS

The facility is considered a major source because it is on the same property as Saul Trails Landfill. The facility is operating under Title V permit MI-ROP-P0270-2012a which was revised on June 28, 2016.

EULFGPLANT controlled by a 3,200 scfm regenerative thermal oxidizer and 4,200 scfm open flare.

- I. Emission Limits – NA
- II. Material Limits – NA
- III. Process/Operational Restriction
 1. Compliance – The MAP has been reviewed. No changes to this plan have been made since the last inspection. No issues have occurred at the plant that would indicate that changes need to be made to the MAP at the time of the onsite inspection.
 2. Compliance – Based on the records submitted with the 2016 MAERS report, the flare operated for 1,659 hours, which is less than the permitted limit of 3,744 hours per year.
 3. Compliance – The facility only burns processed landfill gas in the flare.
 4. Compliance – The open flare operates with a continuous pilot so that all gas piped to the flare can be flared.
 5. Compliance – During the onsite inspection, I did not observe any visible emissions from the flare.
- IV. Design/Equipment Parameters
 1. Compliance – During the onsite inspection, the RTO was operating properly. The RTO usually operates in a temperature range between 1600 °F and 1750 °F, which is above the minimum combustion chamber temperature of 1400 °F.
 2. Compliance – A temperature monitoring device is installed on the RTO. The temperature is recorded electronically.
 3. Compliance – The gas collection system was built in accordance with 40 CFR Part 60 Subpart WWW and is acceptable to the Department.
 4. Compliance – The flare operates a continuous flare that is monitored with a thermocouple.
- V. Testing/Sampling
 1. Compliance – An initial stack test was performed on April 30, 2013 when the gas processing plant began operation. This test showed that the flare was operating in compliance with the permit requirements.
 2. Compliance – Visual emission testing was performed on April 30,

2013. During the 120 minute observation time period, no VE were observed.

This test showed that the flare was operating in compliance with the permit requirements.

- VI. Monitoring/Recordkeeping
 - 1. Compliance – The temperature for the RTO is collected electronically on a continuous basis. The temperature can be reviewed in as small as two second increments.
 - 2. Compliance – The facility maintains an electronic file of the temperature of the RTO, and can be reviewed in any time frame as low as every 15 seconds.
 - 3. Compliance – The facility maintains an electronic file of the hours the flare operates, as well as any down time for the facility. The records for 2016 were reviewed with the MAERS.
- VII. Reporting – Compliance – The facility has submitted timely annual and semiannual reports for the past year. No deviations have been reported on these reports for 2016 or for the first half of 2017.
- VIII. Stack/Vent Restriction – Compliance – The facility installed all stacks to the permitted requirements. No changes have been made to these stacks.
- IX. Other Requirements – Compliance – The facility operates on the same property as Sauk Trail Landfill. This facility accepts the landfill gas, purifies the gas and sells the gas. Any aspects of landfill maintenance associated with this process are being followed by the facility.

EUTREATMENTSYS: This emission unit is strictly for the NSPS WWW and MACT AAAA requirements pertaining to the landfill gas treatment system.

- I. Emission Limits – NA
- II. Material Limits – NA
- III. Process / Operational Restrictions
 - 1. Compliance – The treatment system operates continuously unless the plant has a malfunction or is performing maintenance.
 - 2. Compliance – Any gas that does not meet the quality needed to be resold is then treated by the RTO and then pass through the open flare. The flare has a continuous operating pilot light.
 - 3. Compliance – The treatment system is controlled by an open flare that appears to be operating properly. It is also controlled by an RTO.
- IV. Design / Equipment Parameters
 - 1. Compliance – The treatment system appears to be properly designed.
- V. Testing / Sampling – NA
- VI. Monitoring / Recordkeeping
 - 1. Compliance – All operating records are maintained electronically and were reviewed during the onsite inspection. No exceedances were reported during the past year.
 - 2. Compliance – All maintenance preformed is recorded electronically and was reviewed during the onsite inspection. A copy of this record is attached to this report.
 - 3. Compliance – All operating reports have been approved and appear to show that the system is operating properly.
- VII. Reporting – Compliance – The facility has submitted timely annual and semiannual reports for the past year. No deviations have been reported on these reports for 2016 or for the first half of 2017.

