

State Registration Number  
N1216

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N1216-2023

**Westside Recycling and Disposal Facility  
and  
Westside Gas Producers, LLC**

State Registration Number (SRN): N1216

Located at

14094 West M-60, Three Rivers, St. Joseph County, Michigan 49093

Permit Number: MI-ROP-N1216-2023

Staff Report Date: February 6, 2023

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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MI-ROP-N1216-2023

**FEBRUARY 6, 2023 - STAFF REPORT**

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan’s Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source’s applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Westside Recycling and Disposal Facility 14094 West M-60 Three Rivers, Michigan 49093
Source Registration Number (SRN):	N1216
North American Industry Classification System (NAICS) Code:	562212
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202100166
Responsible Official – Section 1:	Mike O’Rourke, District Manager 616-258-0389
Responsible Official – Section 2:	Kevin Dobson - Biomass Energy 734-276-5973
AQD Contact:	Matt Deskins, Environmental Quality Analyst 269-303-8326
Date Application Received:	September 16, 2021
Date Application Was Administratively Complete:	September 16, 2021
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	February 6, 2023
Deadline for Public Comment:	March 8, 2023

## **Source Description**

Westside Recycling and Disposal Facility (WRDF) is a Type II Municipal Solid Waste (MSW) landfill and is owned and operated by Waste Management of Michigan, LLC. It is located approximately 2 miles to the southwest of the city of Three Rivers and is mainly surrounded by woods and agricultural areas. The decomposing waste materials disposed of at WRDF generate landfill gas which the WRDF controls using an active gas collection and control system (GCCS). The landfill gas is drawn out of the landfill using various types of gas wells that are under vacuum and is sent to Westside Gas Producers (WGP) which is owned by DTE Biomass Energy and located adjacent to the landfill. WGP then processes the landfill gas using a Kryosol Process which converts it to pipeline grade natural gas and is then sold to a local utility. (Note: WRDF has two open flares that are operated when WGP is not in operation and/or when the landfill gas from certain portions of the landfill do not meet the specifications required by WGP.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2021**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	48.23
Nitrogen Oxides (NO <sub>x</sub> )	23.63
Particulate Matter (PM)	28.88
Sulfur Dioxide (SO <sub>2</sub> )	4.56
Volatile Organic Compounds (VOCs)	6.53
Non-Methane Organic Compounds (NMOCs)	26.76

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is in St. Joseph County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of Carbon Monoxide (CO) exceeds 100 tons per year and the source is subject to 40 CFR Part 62 Subpart OOO (Federal Plan for Municipal Solid Waste Landfills), that requires a 40 CFR Part 70 permit based on a design capacity in excess of 2.5 million megagrams and 2.5 million cubic meters.

The stationary source is a minor source of HAP emissions because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of all criteria pollutants was less than 250 tons per year.

EUASBESTOS, FGLANDFILL-000, and FGLANDFILL-AAAA at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Asbestos promulgated in 40 CFR Part 61, Subparts A and M.

FGLANDFILL-000, FACTIVECOLL-000, FGOPENFLARE-000, EUOPENFLARE, and FGTREATMENTSYS-000 at the stationary source are subject to the Federal Plan Requirements for Municipal Solid Waste Landfills promulgated in 40 CFR Part 62, Subparts A and 000.

FGLANDFILL-AAAA, FACTIVECOLL-AAAA, FGOPENFLARE-AAAA, EUOPENFLARE, and FGTREATMENTSYS-AAAA at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA.

EUCENGINE at the stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions provided by Westside Gas Producers (Section 2) in their application for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

The emission limitation(s) or standard(s) for FGLANDFILL-000, FGLANDFILL-AAAA, FACTIVECOLL-000, FACTIVECOLL-AAAA, FGOPENFLARE-000, FGOPENFLARE-AAAA, EUASBESTOS, EUOPENFLARE, EUCENGINE, FGTREATMENTSYS-000, and FGTREATMENTSYS-AAAA at the stationary source are exempt from the federal Compliance Assurance Monitoring regulation under 40 CFR Part 64, because they are addressed by either 40 CFR Part 61, Subparts A and M; 40 CFR Part 62, Subparts A and 000; and 40 CFR Part 63, Subparts A and AAAA or ZZZZ.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-Wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-N1216-2017 are identified in Appendix 6 of the ROP.

PTI Number			
144-98C	144-98B	144-98A	144-98

**Streamlined/Subsumed Requirements**

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

**Non-applicable Requirements**

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Exemption</b>	<b>PTI Exemption Rule Citation</b>
EUWASTEANTIFREEZE	150 gallon waste antifreeze storage tank.	R 336.1212(4)(c)	R 336.1284(2)(i)
EUGASOLINETANK	300 gallon gasoline storage tank.	R 336.1212(4)(c)	R 336.1284(2)(g)(i)
EUSPACEHEATER1	120,000 BTU/hr gas fired space heater in landfill office.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)
EUSPACEHEATER2	Seven (7) 165,000 BTU/hr gas fired space heaters in maintenance building.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)
EUSPACEHEATER3	Two (2) 100,000 BTU/hr gas fired space heaters in hauling company.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)
EUSPACEHEATER4	Three (3) 125,000 BTU/hr gas fired space heaters in maintenance building.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)
EUCUTDRILLGRIND	Cutting, drilling, and grinding operations in the maintenance building.	R 336.1212(4)(d)	R 336.1285(2)(l)(vi)
EUWASTEOILTANK1	150 gallon waste oil tank.	R 336.1212(4)(c)	R 336.1284(2)(i)
EUWASTEOILTANK2	300 gallon waste oil tank.	R 336.1212(4)(c)	R 336.1284(2)(i)
EUWATERHEATER1	30,000 BTU/hr gas fired water heater in landfill office.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)
EUWATERHEATER2	38,000 BTU/hr gas fired water heater in landfill office.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)
EUWATERHEATER3	358,125 BTU/hr gas fired water heater for power washer.	R 336.1212(4)(b)	R 336.1282(2)(b)(i)

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

**Action taken by EGLE, AQD**

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD’s proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Rex Lane, Kalamazoo District Supervisor. The final determination for ROP

approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number  
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**RENEWABLE OPERATING PERMIT**  
**March 20, 2023 - STAFF REPORT ADDENDUM**

ROP Number  
MI-ROP-N1216-2023

**Purpose**

A Staff Report dated February 6, 2023, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official – Section 1:	Mike O'Rourke, District Manager 616-258-0389
Responsible Official – Section 2:	Kevin Dobson - Biomass Energy 734-276-5973
AQD Contact:	Matt Deskins, Environmental Quality Analyst 269-303-8326

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

**Changes to the February 6, 2023 Draft ROP**

No changes were made to the draft ROP.