N2689 Manla Monroe

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

Facility: SRN: VIENNA JUNCTION LANDFILL N2689 Location: 6505 HAGMAN RD District: Jackson County: MONROE City: **ERIE** State: MI Zip Code: 43133 Compliance Compliance Status: Source Class: **MAJOR** Staff: Diane Kavanaugh-Vetort FCE Begin Date: 7/27/2015 **FCE Completion** 7/26/2016 Date: Comments: Title V ROP Facility Compliance inspection and FCE Summary

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
07/26/2016	Scheduled Inspection	Compliance	Additional Contact: Jim Adams, Republic Services. Conducted complete scheduled compliance inspection. FCE Title V Major Source. NSPS Subpart WWW, MSW landfill.
05/20/2016	NESHAP (Part 61)	Compliance	Title V ROP source Asbestos Notification (Revision A). VJ Landfill plans construction to start June 13 and continue until July 29 weather permitting. Excavation and disturbance is possible and requires this notification.
05/11/2016	NESHAP (Part 61)	Compliance	Title V ROP source Asbestos Notification. VJ Landfill plans construction to start April 18 and continue weather permitting. Excavation and disturbance is possible and requires this notification.Asbestos Notification. SEE ENTRY 5/10/16 THIS WAS DELAYED AND REVISED.
05/11/2016	MAERS	Compliance	MAERS Report ROP Cert. Major T5 with 2 Sections. Emissions: CO 22.34 tons, NMOC 6.1 tons, NOx 6.7 tons, PM10 21.5 tons. LFG to the Flare increased from 2014 @ 27%. Report: 446.81 mmcf. Solid Waste Tons down and NMOC down 11%. Device miles up 4%. Attached support docs.

Activity Date	Activity Type	Compliance Status	Comments
05/11/2016	ROP Other	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report. One Malfunction event when flare down for 32.6 hrs due to power outage in 11/12/15. 28 start up and 1 shutdown event. Flare auto shutdown if plant gas demand increases. If doesn't auto start has to be manually started.
05/11/2016	ROP SEMI 2 CERT	Compliance	Major MSW LF with two Sections. Report Well and Surface monitoring exceedances. Only one Well was outside timeline and alt timeline was requested/approved. Support records attached. Flare Temp/flow data also has had deviations over time. Normal due to shutdowns/no bypass. Acceptable.
05/11/2016	NSPS (Part 60)	Compliance	Semi Annual NSPS Report (See other entries) Required report Well and Surface monitoring data and control equipment downtimes. No surface monitoring exceedances.
05/11/2016	ROP Annual Cert	Compliance	
05/11/2016	ROP Annual Cert	Compliance	Major T5, MSW Landfill -Section 2 Gas to energy - Fortistar operates NSPS treatment system only and gas is sent off-site to a third party.
05/11/2016	ROP SEMI 2 CERT	Compliance	Major T5, MSW Landfill -Section 2 Gas to energy - Fortistar operates NSPS treatment system only and gas is sent off-site to a third party.
05/11/2016	ROP Other	Compliance	Semi-Annual Startup, Shutdown, and Malfunction Report
05/11/2016	MAERS	Compliance	MAERS ROP Cert. Major T5 with 2 Sections. Emissions: CO 22.34 tons, NMOC 6.1 tons, NOx 6.7 tons, PM10 21.5 tons. LFG to the Flare increased from 2014 @ 27%. Report: 446.81 mmcf. Solid Waste Tons down and NMOC down 11%. Device miles up 4%. Attached support docs.

Activity Date	Activity Type	Compliance Status	Comments
03/02/2016	Telephone Notes		Contacted John, VJ Manager to discuss recent odor complaint AQD received from area resident. Complainant also called John (said 2/6 and 2/20) and has complained over the years. He informed me that another resident (neighbor of above Vicky Gwinn) also complained and he responded. He found nothing unusual & no odor. He believes odor may be from natural area that has had odor in the past. Pat Brennan & Glen E. investigated it in the past and found the vegetation in the mud bog can release odor when uncovered (like low tide). Odor is more like described "propane" odor. Consider resolved pending further complaints.
12/02/2015	ROP Other	Compliance	DKV email to James Adams requested explanation of LandGEM input support docs for MAERS difference 2012 and prior from 2013 and 2014 (match each other). JA reply: "Per our air consultant; The GCCS review/update determined that the bulk of the reported "waste acceptance" tonnages (thru the 2012 MAERS report) were "total" tonnages, when they are supposed to be MSW-fraction only for the LandGEM model. Reported tonnages for years 2003, 2004, and 2010 - 2012 were found to be MSW-fraction (i.e., "correct"). Other recent years waste receipts data were rereviewed, and the average actual MSW-fraction was determined to be ~77%. Beginning with the 2013 MAERS report (prepared in 2014), all prior "total" tonnages in the LandGEM became (Original tonnage * 0.77) = MSW-fraction. In summary, the LandGEM "Input Review" from 2013 and going forward are "accurate," and the LandGEM was previously overestimating NMOC generation, and thus the facility has been overreporting fugitive NMOC emissions. Hopefully this clarifies it for you. Let us know if you need anything else." This is an acceptable explanationdkv

Activity Date	Activity Type	Compliance Status	Comments
11/13/2015	Reg. Applicability Determination	Compliance	10/23/2015 received letter from Republic "Verification of Exemption status for the proposed landfill Expansion at VJ". AQD verified w/OWMRP Larry Bean & Alex Whitlow - issued construction permit July 2015 for vertical expansion (west side). Proposing to meet R278 and R285(aa). LandGEM Summary emissions attached. Predict 35.22 megagrams (38.82 tons) NMOC in 5th year of operation. Will follow NSPS requirement to install GCCS within 5 yrs. active or 2 yrs. closed. Appears acceptable.
09/30/2015	ROP Other	Compliance	Semi-Annual Startup, Shutdown, and Malfunction Report. Vienna Junction Energy, LLC (LFG to energy plant) had no SSM events to report. Acceptable.
09/30/2015	ROP Semi 1 Cert	Compliance	ROP 1st Semi-annual Cert & Dev report. Rec'd timely. VJ Energy LLC (Section 2) reports for LFG Treatment System. Report 1 deviation of times of digital control system malfunction resulted in loss of monitoring data. Repeat report for 5 yrs of record retention. 4 events TS shutdown (3 hr 28 min total). Dates are different than Flare off-line dates. Acceptable.
09/30/2015	ROP Semi 1 Cert	Compliance	ROP 1st Semi-annual Cert & Dev report. Received timely. LF reports 4 deviations; requested one alternative timeline/approved. 3 times all controls not operational >1 hr. 10 times when Enclosed flare temp and/or flow not recorded >15 min (power outages). 1 event temperature below avg. combustion temp 1400 deg F. for 4.1 hrs on Feb 2nd. NOTE future: designed to shut down & didn't / reason unknown-speculate inclement weather. Q-Alarms/repair & maintenance? Acceptable at this time as only one occurrence during 6 mo. period.
09/30/2015	NSPS (Part 60)	Compliance	Semi-Annual NSPS Report. Timely and Acceptable. (See entry ROP Semi 1 Cert; Section 1 for details)

Activity Date	Activity Type	Compliance Status	Comments
09/30/2015	ROP Other	Compliance	Semi-Annual Start up, Shutdown, and Malfunction Abatement Report. LF reports 3 events when Flare & recorder were off-line (down) greater than 1 hr. but none longer than 5 days. Acceptable.

Name: Add Date: 9/1/16 Supervisor: Page 5 of 5