N2689 Memla 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: 7/11/17 **FCE Completion** 7/11/2018 Date: Comments: Major Source, ROP. PCE/FCE.

## **List of Partial Compliance Evaluations:**

Activity Date	Activity Type	Compliance Status	Comments
07/11/2018	Scheduled Inspection	Compliance	Title V Major Source. Complete scheduled compliance inspection PCE/FCE.
04/19/2018	MAERS	Compliance	ROP Cert received 3-14-18. Support docs attached. CO 35.5 tons, 6 tons NMOC, 11 tons NOx, 30 tons PM10, all other pollutants less than 1 ton. Acceptable.
03/29/2018	ROP Annual Cert	Compliance	Annual ROP Cert/Dev Report 2017. VJ Landfill Republic (Section 1) reports for the Landfill, active gas collection system and Enclosed Flare control. The primary control Treatment System did not operate the entire period (Fortistar Section 2 operates & sends offsite to 3rd part). General GCCS system deviations reported. Acceptable actions taken.

Activity Date	Activity Type	Compliance Status	Comments
03/29/2018	ROP SEMI 2 CERT	Compliance	2nd Semi-annual ROP Cert/Dev Report 2017. VJ reports 4 deviations = parameter exceedances for Wells and Control equipment downtime, and Temp/flow to Flare not recorded (Tables attached). Two ATR requested for Wells 101R & EW114 that didn't return to compliance within 15 days = deviation. Reported 17x all control offline >1 hr. 3x Temp/flow flare data not recorded for > 15 minutes mainly due to power outages & maintenance. Zero SEM events. 7 new or redrilled Wells. Acceptable actions taken.
03/29/2018	NSPS (Part 60)	Compliance	2nd Semi Annual NSPS Report 2017. VJ reported 2 Wells and submitted ATR requested for Wells 101R & EW114 that didn't return to compliance within 15 days =deviation. 17x all controls offline >1 hr. No SEM events. Seven new Wells & redrills. Treatment System did not operate the entire year. Enclosed Flare is only control.
03/29/2018	ROP Other	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report 2017. VJ (Section 1) reports EUEnclosedflare 27 start-up, 10 shut-down and 12 malfunction events. Table attached. Fortistar (Section 2) Treatment System not operational during this period (no 3rd party for gas at this time). Longest Flare shutdown 12 hours due to power outage, 17 times when control not operational >1 hr. No times when no control for 5 days or more.
03/29/2018	ROP Other	Compliance	Semi-Annual Startup, Shutdown, and Malfunction Report 2017. VJ (Section 1) reports EUEnclosedflare 27 start-up, 10 shut-down and 12 malfunction events. Table attached. Fortistar (Section 2) Treatment System not operational during this period (no 3rd party for gas at this time). Longest Flare shutdown 12 hours due to power outage, 17 times when control not operational >1 hr. No times when no control for 5 days or more.

Activity Date	Activity Type	Compliance Status	Comments
03/29/2018	ROP Annual Cert	Compliance	Annual ROP Cert/Dev Report 2017. VJ Energy LLC (Section 2) reports for Treatment System of LFG to offsite 3rd party user, formerly GM. GM has refused gas at this time and therefore the TS did not operate the entire year. LFG is controlled by Enclosed Flare owned/operated by VJ LF (Section 1).
03/29/2018	ROP SEMI 2 CERT	Compliance	2nd Semi-annual ROP Cert/Dev Report 2017. VJ Energy LLC (Section 2) reports for Treatment System of LFG to offsite 3rd party user, formerly GM. GM has refused gas at this time and therefore the TS did not operate the entire period. They report deviation for 5 yr period of missing data. LFG is controlled by Enclosed Flare owned/operated by VJ LF (Section 1).
01/24/2018	ROP Other	Compliance	Landfill Gas Collection and Control System Design Plan. PENDING review with WMRPD (MOU). Also Subpart XXX is new Federal Standard requires State Plan. This is on hold. Alternative to XXX requirements may need to be reviewed by EPA.
01/04/2018	NSPS (Part 60)	Compliance	ROP Other also; Landfill Gas Collection & Control System (GCCS) Design Plan. Commenced modification after 7/17/14 hence became subject to NSPS Subpart XXX. Currently ROP NSPS WWW. VJ subject due to solid waste expansion permit issued 7/2/15; commenced construction 5/2016. Design capacity grtr than 2.5 Mcf and MMg and uncontrolled NMOC 931 in new NMOC Report (see entry 11/28/2016).
10/09/2017	ROP Other	Compliance	1st Semi annual SSM Report. VJ (Section 1) reports EUEnclosedflare 10 start-up and 10 malfunction events. Table attached. Fortistar (Section 2) Treatment System not operational during this period (no 3rd party for gas at this time). Longest Flare shutdown 11 hours due to power outage, 6 times when control not operational >1 hr. No times when no control for 5 days or more.

Activity Date	Activity Type	Compliance Status	Comments
10/09/2017	ROP Semi 1 Cert	Compliance	1st Semi-annual ROP Cert/Dev Report. VJ reported parameter exceedances for 25 Wells (Table 1) 1 Well EW101 that didn't return to compliance within 15 days =deviation. Requested ATR cutoff/capped and redrilled Well brought online 8/1/17. Reported 7 times Flare down and no control >1 hr. Reported 3 times flare temp/flow data not recorded for more than 15 minutes; flare offline.
10/09/2017	NSPS (Part 60)	Compliance	1st Semi Annual NSPS Report. VJ reported 1 Well EW101 that didn't return to compliance within 15 days =deviation. Reported 7 times Flare down and no control >1 hr. and 3 times flare temp/flow data not recorded for more than 15 minutes; flare offline. Treatment System (S2 VJ Energy LLC) didn't operate during this reporting period. Therefore Flare is only control. No times GCCS not operational 5 days or more. SEM: Q1 7 exceedances and all were cleared; Q2 zero. No Wellfield expansion, no new wells.
10/09/2017	ROP Other	Compliance	1st Semi-annual Startup, Shutdown, and Malfunction Report. VJ Energy (Fortistar) is Section 2. Report for Treatment System for LFG and then send off site to third party user (formerly GM). TS did not operate this entire period. GM is currently not accepting gas. All LFG is going to Enclosedflare owned/operated by VJ, Section 1.
10/09/2017	ROP Semi 1 Cert	Compliance	1st Semi-annual ROP Cert/Dev Report. VJ Energy LLC (Section 2) reports for Treatment System of LFG to offsite 3rd party user, formerly GM. GM has refused gas at this time and therefore the TS did not operate the entire period. LFG is controlled by Enclosedflare owned/operated by VJ LF (Section 1).

Activity Date	Activity Type	Compliance Status	Comments
10/06/2017	Other	Unknown	See previous regarding ATR/HOV for EW101R - Activity Date 8/18. On October 6, email rec'd from Andy with update. Temperature <131F on 9/19 and 26, but 134F as of 10/5 so will have O&M contractor pull bag sample on next visit and will proceed with HOV request when results come back. Gas quality remained stable, currently 57% CH4, 42.9% CO2, 0% O2 and 0.1% balance, -11.4 applied vacuum, 134F at 42 cfm flow.
08/18/2017	Other	Compliance	Responded by email to email ATR/HOV request for EW101R. Consultant Andy Secord, AQSI, on behalf of VJ. AQD approved interim ATR/HOV and expects follow up as indicated in request. "The facility thus proposes to continue to operate well EW101R under vacuum to evaluate whether the wellhead temperature can be reduced via continued gas extraction by October 15, 2017. If wellhead temperature remains >131F (and gas quality remains good) as of October 15, 2017, Vienna Junction will collect samples for carbon monoxide and hydrogen concentration, and subsequently petition MDEQ for an HOV."
07/25/2017	Other	Unknown	AQD inquired by email to Consultant 7/15 & 7/25 emails interim ATR/HOV request for EW105R. Consultant Andy Secord, AQSI, on behalf of VJ. ATR/HOV request received stated a formal Alternative timeline request would be submitted the same week. PENDING receipt. "Well 105R at Vienna Junction was accessed and tuned to compliance on 7/18/17. Apparently, the exceedance was solely a wellhead issue: Site had raised well, and wellfield technician subsequently found the Ferco fitting (between well casing and wellhead) had not been completely re-tightened when they re-installed wellhead, thus allowing air instrusion. Technician fixed, and appears to have resolved issue."

Date: 4/19/18 Supervisor:

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