DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

Facility : VIENNA JUNCTION LANDFILL	SRN :	N2689
Location: 6233 HAGMAN RD	District :	Jackson
	County :	MONROE
City: ERIE State: MI Zip Code: 43133 Comp Statu	oliance s :	Non Compliance
Source Class : MAJOR Sta	ff: Diane	Kavanaugh Vetort
FCE Begin Date : 5/10/2021 FCI Dat	E Completion e :	5/10/2022
Comments : Major Source FCE inspection		

FCE Summary Report

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/10/2022	On-site Inspection	Non Compliance	ROP Major Source FCE and SEM (MK) and Jeff Benya, AQD. Records received 4/15/22 to prepare for SEM portion. Remaining compliance records received 5/13/22. See MK 5/10 report for SEM portion.
05/10/2022	On-site Inspection	Compliance	Methane SEM survey conducted as part of a compliance inspection. 11 SEM hits were detected. Refer to Diane's compliance inspection report for the results of rest of inspection. Mailed copy of report via letter from Mike Kovalchick 5/12/22.
04/14/2022	MAERS	Compliance	Electronic MAERS Report submitted. Received paper MAERS original 3/23/22. Support docs attached. Landgem used. CO 37T; NMOC 6T; NOx 11T; PM10F 10T; SO2 4T. LFG 747 mmcf to Flare. Waste: 226,263 tons; Device miles 58090. Miles - 84% from 2020, Gas up 14% and flare down 5%. Acceptable.
03/31/2022	ROP Annual Cert	Compliance	2021 Annual ROP Cert & Deviation Report. VJ LF Section 1. Includes both Semi-annual reports.

Activity Date	Activity Type	Compliance Status	Comments
03/31/2022	MACT (Part 63)	Compliance	2021 2nd Semi Annual Startup, Shutdown and Malfunction Report - 2021_2 (on their paperwork) This requirement ended 9/27/21. Report 25 start-up, no shutdowns. 32 Malfunction events Table. Same/similar to other Table 2nd Semi.
03/31/2022	ROP SEMI 2 CERT	Compliance	2021 2nd Semi-annual Cert & Deviation Report. VJ LF Section 1. No well deviations positive pressure /Temp greater than 145F. 22 times Deviation: Enclosed flare was not operational for >1 hr. (lists 37 dates some multi-times/day but 22 up to 9/30 NSPS timeline ended 9/27) No 5 day deviations. 3 exceedances 3rd Q SEM (resolved). 2 exceedances 4th Q SEM (resolved). No new wells or expansion. (EIL contact Janet Todia jtodia@eillic.com (614)357- 4261).
03/31/2022	MACT (Part 63)	Compliance	2021 Semi annual startup, shutdown and malfunction report. Vienna Junction Energy Section 2. Not operational, idled for 5-10 years. No 3rd party user.
03/31/2022	ROP Annual Cert	Compliance	2021 Annual ROP Cert & Deviation Report. Vienna Junction Energy Section 2. During the entire reporting period, this source was in compliance with ALL terms and conditions in the ROP. Treatment System is idle / not operational /no 3rd party user. Many years idled.
03/31/2022	ROP SEMI 2 CERT	Compliance	2021 2nd Semi-annual ROP Cert & Deviation Report. Vienna Junction Energy Section 2. During the entire reporting period, this source was in compliance with ALL terms and conditions in the ROP. Not operational and has been idled for 5-10 years. No off- site/3rd party LFG user.
02/08/2022	Other	Compliance	Letter sent via email to Christina from Diane Kavanaugh Vetort in response to their Request for Alternatives - Flare Flow Rate Limitation Statement

Activity Date	Activity Type	Compliance Status	Comments
12/28/2021	Other Non ROP	Compliance	Received formal response to GCCS Plan review approval AQD sent January 2021. Follow up teleconference in April 2021 discussed issue of Flare testing & flow rate capacity & temperature. AQD stated flare limited to tested flow rate; VJ disagrees thinks maximum 3000 cfm applies. Consult LF Wkgrp (some) for comment/consistency. Previously discussed early 2021 w/these staff.
10/19/2021	ROP Semi 1 Cert	Compliance	2021 1st Semi-annual Dev & Cert Report. Vienna Junction Energy Section 2. LFG treatment has not been operation for 5 or more years; no 3rd party user. Report no deviations.
10/19/2021	MACT (Part 63)	Compliance	1st Semi annual NESHAP Subpart AAAA Report. VJE is not operational and hasn't been for many years. No treatment system operation / no 3rd party user.
10/19/2021	MACT (Part 63)	Compliance	2021 1st Semi Annual Startup, shutdown and Malfunction Report (SSM). VJ LF operates one Enclosed Flare as LFG control. Report 64 start-up and 3 shutdown events. 61 malfunction events the longest 28 hrs due to power outage. 21 hrs due to power surge; 21 hrs due to air compressor shutdown. NOTE for next inspection many cite Air compressor shut down. At one point had some for maintenance of the AC but then more AC shut downs.
10/19/2021	ROP Semi 1 Cert	Compliance	2021 1st Semi-annual Certification & Deviation Report. VJ LF is Section 1. Report only deviation as no control to the wellfield for greater than 1 hr. State all wellhead exceedances were corrected within 15 days. Acceptable.

Activity Date	Activity Type	Compliance Status	Comments
10/19/2021	NSPS (Part 60)	Compliance	2021 1st Semi-annual NSPS Report. Report 55 times the control device (Enclosed Flare) was not in operation more than 1- hour. Nothing in excess of 5 days. Q1 had 11 exceedances all cleared. Q2 had 3 exceedances and all cleared. No new wells or GCCS expansion. Acceptable. NOTE concern Flare downtime frequent almost entire months Jan/Feb.
10/11/2021	Other	Compliance	Document receipt of Letter notifying AQD of Well Abandonment. Reference VJ Construction Permit 4146 on 7/2/2015 wells EW 13R, EW14, EW15 and EW38 are being abandoned during the month of 9/2021 as part of the new cell construction this year. They state they'll be adding new horizontals to replace the abandoned vertical wells. Fwd FYI to Larry/Brett, MMD.
10/07/2021	NSPS (Part 60)	Compliance	Received letter from VJ states according to VJ Construction Permit number 4146, wells EW 13R, EW14, EW15 and EW38 are being abandoned during the month of September 2021, as part of the new cell construction this year. Wells are located in Area 7 of the landfill. The site will be adding new horizontals in the construction area to replace the abandoned vertical gas wells.
10/01/2021	ROP R215 Notification Compliance	Compliance	Landfill Subpart AAAA Permit Change - OPT IN to new standard. AQD log here and under compliance-ROP-Notice of Change (NOC). This way the next ROP writer would know there is a change needed during the next renewal.

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Supervisor:

Name: <u>Minne</u> Kavanaugh Vétert _ Date: 8/4/22