

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N543231348

FACILITY: Southeast Berrien County Landfill Authority		SRN / ID: N5432
LOCATION: 3200 Chamberlain Rd., BUCHANAN		DISTRICT: Kalamazoo
CITY: BUCHANAN		COUNTY: BERRIEN
CONTACT: Tyler Ganus , Environmental Coordinator		ACTIVITY DATE: 09/22/2015
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Schedule Inspection of SEBCL (Section 1) and NANR (Section 2).		
RESOLVED COMPLAINTS:		

## Southeast Berrien County Landfill FY 2015 Inspection

On September 22, 2015 AQD staff (Matt Deskins and Monica Brothers) went to conduct a scheduled unannounced inspection of the Southeastern Berrien County Landfill (SEBCL) located in Buchanan, Berrien County. SEBCL is a licensed Type II municipal solid waste landfill and is subject to the federal New Source Performance Standard (NSPS), 40 CFR Part 60 Subpart WWW, and the National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subpart AAAA. These and other applicable requirements are contained in SEBCL's Renewable Operating Permit (ROP) No. MI-ROP-N5432-2011. Back in 2008, SEBCL signed an agreement to lease a portion of their property to North American Natural Resources (NANR) for the construction of a landfill gas to energy facility. NANR was issued a permit (PTI No. 296-08) at that time for four stationary reciprocating internal combustion engines (RICE) and this permit/facility is incorporated as Section 2 in the SEBCL's ROP. The engines are also subject to 40 CFR Part 60 Subpart JJJJ. The purpose of the inspection was to determine both SEBCL and NANR's compliance with the preceding air regulations and their respective sections of the ROP. Staff departed for the facility at approximately 8:45 a.m.

Staff arrived at the SEBCL at approximately 10:20 a.m. Winds were out of the S/SE so staff drove along Chamberlain Road that borders the landfill to the north to see if any odors could be detected. Staff did notice some landfill gas odors that staff would consider between a 1 and 2 on the AQD odor scale. Staff then proceeded to the office area and noted quite a few people in a conference room. Someone noticed staff come in and they came out to ask staff what they needed. Staff introduced themselves and stated the purpose of the visit. That person mentioned that staff would need to meet with Tyler Ganus (Environmental Coordinator) and he went back into the conference room to let Tyler know staff was there. Tyler then came out of the conference room and we proceeded into an office area. Staff introduced themselves and stated the purpose of the visit. Staff then gave Tyler a copy of the DEQ Environmental Inspection Brochure and a business card. Staff then went into further detail about the ROP and what the inspection would entail. Tyler mentioned that he recently (past 2 months) took over the position held by Andrea Alexander who left to take another job back in July. Tyler asked staff to bear with him because Andrea's departure wasn't expected and he's still trying to get up to speed with things.

Staff mentioned they would assist on the explanation of things required by the ROP but it is up to the facility to comply with all the requirements.

Staff mentioned to Tyler that he should find a copy of the ROP and get familiar with it because most are federal regulations that apply to the landfill. Staff then asked Tyler if he was aware of the Semi-Annual Reports that were recently required to be submitted or postmarked to the AQD by September 15<sup>th</sup>. Tyler said that he was and that their consultant (Cornerstone) had submitted them. He then showed staff an e-mail on his computer regarding it. Staff noted that on September 11<sup>th</sup> the consultant had sent the reports to Tyler and stated that they needed to be put on SEBCL letterhead and submitted by the 15<sup>th</sup>. Tyler said he misunderstood that. Staff then asked if Tyler would print staff off a copy of it and after seeing the e-mail, staff told Tyler they would not find them in violation for this instance. Tyler then mentioned that they were working with Cornerstone on developing the ROP Renewal Application. Staff mentioned that was good and to make sure it gets submitted within the required timeframes, preferably sooner rather than the later date allowed. Staff then asked Tyler if he was aware of the monthly wellfield monitoring requirements. Tyler said that he was aware of the monthly monitoring requirement but not of the timeframes in which to take corrective action for any issues. He said he is now aware of those but said back in July they had 3 wells that didn't have corrective actions taken on them within the required timeframes. He said all the wells were back in compliance in August. Staff verified this when they reviewed wellfield records later. Staff then mentioned to Tyler that they would not find them in violation for this instance since they did get the wells

back in compliance in a timely manner and are now aware of the requirements. Staff then asked Tyler some general questions before taking time to review records and go on a tour of the landfill.

According to Tyler, SEBCL takes in on average 800 tons per day of waste during the summer and lesser amounts during the winter. The landfill employs approximately 20 people and they are working M-F from 7 a.m. until 5 p.m. He said on Saturdays they are open from 8 a.m. until noon. Staff then asked about the Recycling Center next door. Tyler said that it was mainly meant to be used by residents of area municipalities but they don't turn others away from using it. Staff then looked over records required to be kept by the ROP. The following is a summary of the facilities emission groups, flexible groups, the inspection staff conducted, and the facilities compliance status. It will then be followed by staff's inspection of the NANR facility along with their compliance status in regards to their section of the ROP.

**EULANDFILL: Appears to be in COMPLIANCE**

As mentioned previously, SEBCL is currently taking in about 800 tons of trash per day. They are keeping track of the waste acceptance rates and that is also a requirement of Part 115 that the OWMRP administers. According to Tyler, they do not re-circulate any leachate and it all ends up going to the POTW in Buchanan after it goes through a nitrification treatment process do to excessive ammonia in it. The facility has an approved active gas collection system and control device (Open Flare). The flare is used as a back-up control device should NANR's engines go down. The landfill has been conducting quarterly surface emissions monitoring (most recently on September 17<sup>th</sup>) and they appear to be keeping the appropriate records as required. Employees of SEBCL (either Mark or Larry) conduct the surface emissions monitoring with a Landtec SEM 500. Staff reviewed records that included instrument calibration data, the route traversed while conducting the monitoring, and the data for the last three quarters and no exceedences were documented. They are conducting cover integrity checks once a month as required. They typically conduct these either during the monthly well monitoring or when doing the quarterly surface emissions monitoring. The facility has a Startup, Shutdown, and Malfunction (SSM) Plan on site as required. The facility usually submits the required semi-annual ROP Certification Reports and SSM Reports to the district office on time but as noted earlier, the most recent one wasn't.

**EUACTIVECOLL: Appears to be in COMPLIANCE**

The facility has an approved active gas collection system as required and the materials used in the gas collection system appear to be either HDPE or PVC which meets requirements. The facility keeps an ASBUILT drawing showing the existing collection system and proposed expansion areas. The facility currently has 72 gas wells and monthly monitoring is done with an Envision gas analyzer. Either Mark or Larry of SEBCL does the monitoring and they are recording static pressure (vacuum), oxygen, and temperature as required. Staff reviewed the previous six months of data and except for an instance in July as was mentioned previously, the facility has always taken corrective action in the required time frames or has asked for alternate compliance timelines and/or alternate operating scenarios for any monitoring parameters that exceed NSPS limits. The facility usually submits the required semi-annual ROP Certification Reports and SSM Reports to the district office on time but as noted earlier, the most recent one wasn't.

**EUOPENFLARE: Appears to be in COMPLIANCE**

The facility has an open flare that is used for back-up purposes should the NANR facility shut down. The flare is a skid mounted unit and the manufacturer is Calidus with a flow rating capacity of 200 to 2000 scfm. The control panel of the flare has been retrofitted with John Zink instrumentation. The open flare is equipped with a Yokogawa electronic data logger that records flow and temperature. The information gets downloaded weekly to their computer. The flare is also equipped with a thermocouple to monitor the continuous presence of a flame. The flare is not equipped with any type of bypass and should the flare shut down while in use, a pneumatic valve (operated by a nitrogen tank) automatically closes preventing emissions from venting to the atmosphere. Tyler said that they did some maintenance on the flare skid recently that mainly involved the blower unit. Staff noted from records that the flare was last operated on August 6<sup>th</sup>.

**EUGWTS: Appears to be in COMPLIANCE**

The groundwater treatment system is a tray type air stripper the facility installed quite a few years ago. The system is still operating around the clock and consists of 30 pumping wells. The facility is conducting monthly sampling of the influent and effluent for the appropriate contaminants that are required by their NPDES permit and

ROP for their groundwater treatment system. However, Tyler wasn't aware of the Rule 290 monthly emission records that need to be kept on the system. Since in the past emissions were always negligible, staff decided not to send a violation notice out for this instance but did follow up with Tyler by sending him a copy of how the records use to be kept by an e-mail (See Attached). Should this still be an issue during future inspections, staff will then look to find them in violation.

**FGCOLDCLEANERS:** Appears to be in COMPLIANCE

The coldcleaner is located on in their maintenance garage and is not a heated unit. Staff has reviewed the MSDS sheet on previous occasions and it didn't indicate that the solvent contained any of the listed halogenated compounds that were over 5 percent by weight. The unit had its lid closed and operational instructions posted on it. Crystal Clean still maintains it.

**FGRULE290:** Appears to be in COMPLIANCE

The facility hasn't installed any new equipment using this exemption.

**ASBESTOS:** Although the facility stopped accepting this type of waste back in 2000 to satisfy a WHMD violation, the asbestos requirements still need to be included in the ROP since they had at one time accepted asbestos. They have been submitting notifications as required and the facility has warning signs, fencing, and/or natural features surrounding the property which should adequately deter access by the general public.

**SEBCL INSPECTION CONCLUSION:** Although staff noted a few minor issues, staff will consider the facility to be in COMPLIANCE with Section 1 of ROP No. MI-ROP-N5432-2011 at the present time. Staff then went on a tour of the landfill with Tyler and did not note any issues. Once back to the office, staff thanked Tyler for his time and departed the facility at approximately 1:00 p.m. to go have lunch.

## North American Natural Resources FY 2015 Inspection

After having lunch, staff proceeded to the NANR facility and arrived at approximately 2:00 p.m. Staff arrived at approximately the same time that a car was pulling in. The two people in the car were the NANR plant operators (Victor Sokolowski and Brandon ?). Staff introduced them self and stated the purpose of the visit. Staff then mentioned that they were going to show Monica the flare skid and other equipment located adjacent to the plant prior to coming into the building. Staff then gave Victor a copy of the DEQ Environmental Inspection Brochure and a business card. Staff then proceeded over to the flare skid where staff explained some various equipment to Monica. Staff also explained what equipment was needed to meet the definition of a "treatment system" for the landfill gas prior to combustion in the engines. Staff then proceeded back over and into the plant. Staff then asked Victor and Brandon some general questions about operations. The following is a summary of those discussions followed by their ROP requirements and their compliance status with them.

According to Victor and Brandon, NANR owns 5 landfill gas to energy projects in Michigan. The NANR facility located at SEBCL was permitted and constructed for 4 Caterpillar 3520 internal combustion engines. At the present time, only 3 engines have been installed with only 2 of them operating 24/7 due to lack of landfill gas to operate the 3<sup>rd</sup>. The 3<sup>rd</sup> engine is currently used as a swing engine and is started up when one of the other engines needs to go down for maintenance. Engine #1 has 44,229 hours on it, Engine #2, 38,466 hours, and Engine #3 40,119 hours. Staff then looked over their ROP requirements and they are as follows.

### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUENGINE1-S2	Caterpillar 3520 landfill gas engine.	7-17-2009	FGENGINES-S2
EUENGINE2-S2	Caterpillar 3520 landfill gas engine.	7-17-2009	FGENGINES-S2
EUENGINE3-S2	Caterpillar 3520 landfill gas engine.	7-17-2009	FGENGINES-S2
EUTREATMENTSYS-S2	This emission unit treats landfill gas before its subsequent use or sale. The treatment system removes particulate to at least the 10 micron level, compresses the landfill gas, and removes enough moisture to ensure good combustion of gas for subsequent use; therefore, guaranteeing that the intent of the destruction of the NMOC will be maintained.	5-9-2011	NA

**EUTREATMENTSYS-S2  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

This emission unit treats landfill gas before its subsequent use or sale. The treatment system removes particulate to at least the 10 micron level, compresses the landfill gas, and removes enough moisture to ensure good combustion of gas for subsequent use; therefore, guaranteeing that the intent of the destruction of the NMOC will be maintained.

**POLLUTION CONTROL EQUIPMENT**

Any emissions from any atmospheric vents or stacks associated with the treatments system shall be subject to §60.752(b)(2)(iii)(A) or (B).

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall operate the treatment system at all times when the collected gas is routed to the treatment system. (40 CFR 60.753(f))

AQD Comment: Appears to be in COMPLIANCE. The facility operates the system whenever landfill gas is routed to it.

2. The permittee shall operate the treatment system so that any emissions from any atmospheric vents or stacks associated with the treatment system shall be subject to §60.752(b)(2)(iii)(A) or (B). (40 CFR 60.752(b)(2)(iii)(C), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. There are no stacks or vents associated with the treatment system.

3. The permittee shall operate the treatment system to comply with the provisions of 60.753(e) and (f), and 60.756 (d). (40 CFR 60.752(b)(2)(iv), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. The system appears to comply with the requirements of Part 60 Subpart WWW.

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The treatment system shall be designed as approved by AQD. (40 CFR 60.752(b)(2)(iii)(C), 40 CFR 60.752(b)(2)(i)(D), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. The AQD uses the EPA guidance on the design of the system which it appears to meet.

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep up-to-date, readily accessible records of all control or treatment system exceedances of the operational standards in §60.753(e) and (f). (40 CFR 60.758(e), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. There have been no exceedances to date with the system to staff's knowledge.

2. The permittee shall keep records of all preventative maintenance performed in accordance with the preventative maintenance plan (PMP) prepared pursuant to condition IX.3. of this permit. (40 CFR 60.756 (d), R 336.1213(3))

AQD Comment: Appears to be in COMPLIANCE. The facility has a PMP and are documenting maintenance on the engines.

3. The permittee shall provide information to the AQD as provided in 40 CFR 60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The AQD shall review the information and either approve it, or request that additional information be submitted. The AQD may specify additional appropriate monitoring procedures. (40 CFR 60.756(d)).

AQD Comment: Appears to be in COMPLIANCE. The facility operates the treatment system following EPA guidance for a treatment system.

#### **VII. REPORTING**

AQD Comment: Items 1 through 5 below appear to be in COMPLIANCE. The facility is and/or has submitted the below reports.

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be postmarked or received by appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. A description of the operation of the treatment system, the operating parameters that indicate proper performance, and the appropriate monitoring procedures shall be submitted the appropriate AQD District Office for review within 30 days after the issuance of this permit. (40 CFR 60.752(b)(2)(i)(B), 40 CFR 63.1955(a))
5. The permittee shall submit to the appropriate AQD District Office semiannual reports for the landfill gas treatment system. The report shall be received by appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (40 CFR 60.757(f), 40 CFR 63.1980(a), 40 CFR 63.1955(a))

The report shall include:

- a. Value and length of time for exceedance of applicable parameters monitored under §60.756(d). (R 336.1213(3), 40 CFR 60.757(f)(1), 40 CFR 63.1980(a), 40 CFR 63.1955(a))
  - b. Description and duration of all periods when the gas stream is diverted from the treatment system through a bypass line or the indication of bypass flow. (R 336.1213(3))
  - c. Description and duration of all periods when the treatment system was not operating for a period exceeding 1 hour and length of time the control device was not operating. (40 CFR 60.757(f)(3), 40 CFR 63.1980(a), 40 CFR 63.1955(a))
  - d. Description and duration of all periods when the treatment system was not operated in accordance with the operating parameters and monitoring procedures that were part of the plan in condition number VII.4. (R 336.1213(3))
6. The permittee shall submit the startup, shutdown, and malfunction (SSM) report to the appropriate AQD District Office and it shall be delivered or postmarked by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (40 CFR 63.10(a)(5), 40 CFR 63.10(d)(5))

AQD Comment: Appears to be in COMPLIANCE. They have been submitting the SSM Report.

#### **IX. OTHER REQUIREMENT(S)**

1. The provisions of 40 CFR, Part 60, Subpart WWW apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 1 hour for the treatment system. (40 CFR 60.755(e), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE.

2. The permittee shall have developed and implemented a written SSM plan according to the provision in 40 CFR 63.6(e)(3) for EUTREATMENTSYS-S2. A copy of the SSM plan shall be maintained on site. (40 CFR 63.1960, (40 CFR 63.1965(c))

AQD Comment: Appears to be in COMPLIANCE. The facility has an SSM Plan on site that was developed according to the NESHAP.

3. The permittee shall have implemented a written preventative maintenance plan (PMP) for EUTREATMENTSYS. At a minimum, the plan shall include a schedule of maintenance activities consistent with manufacturer's recommendations, and the operating variables that will be monitored to detect a malfunction or failure. A copy of the PMP shall be maintained on site and available upon request. (40 CFR 60.756(d), R 336.1213(3), R 336.1911)

AQD Comment: Appears to be in COMPLIANCE. The facility has a PMP and it was also submitted to the AQD.

#### **FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGENGINES-S2	Landfill gas engines operated by North American Natural Resources SBL-LLC	EUENGINE1-S2 EUENGINE2-S2 EUENGINE3-S2

**FGENGINES-S2  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Landfill gas engines operated by North American Natural Resources SBL-LLC. (A fourth engine was permitted, but at the time of this ROP being issued, the engine has not been installed.)

**Emission Unit:** EUENGINE1-S2, EUENGINE2-S2, EUENGINE3-S2

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.62g/HP*Hr <sup>2</sup>	hourly	FGENGINES-S2	SC V 1	40 CFR 52.21(c) and (d)
2. CO	2.8g/HP*Hr <sup>2</sup>	hourly	FGENGINES-S2	SC V 1	40 CFR 52.21(c) and (d)
3. VOC	1.0g/HP*Hr <sup>2</sup>	hourly	FGENGINES-S2	SC V 1	40 CFR 60.4233

AQD Comment: Appears to be in COMPLIANCE. The engines have been tested annually and they have met the above emission limits to date. The next annual test will probably be conducted in October according to Victor.

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and JJJJ, as they apply to FGENGINES-S2.<sup>2</sup> (40 CFR, Part 60, Subparts A & JJJJ)

AQD Comment: Appears to be in COMPLIANCE.

- The permittee shall not operate FGENGINES-S2 unless the engines are operated in a manner consistent with good air pollution control practices for minimizing emissions.<sup>2</sup> (40 CFR, Part 60, Subparts A & JJJJ (60.4243(b)(2)(ii))

AQD Comment: Appears to be in COMPLIANCE. The facility appears to be operating and maintaining the engines to minimize emissions.

## **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall verify and quantify criteria pollutant emission rates from FGEngines-S2 by testing at owner's expense, in accordance with Department requirements. (The initial testing was performed on March 9, 2010.) The permittee must conduct performance testing every 8,760 hours or 3 years after the initial test, whichever comes first. No less than 60 days prior to any testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.<sup>2</sup> (40 CFR, Part 60, Subparts A & JJJJ (40 CFR 60.4243(b)(2)(ii) and 60.4244))

AQD Comment: Appears to be in COMPLIANCE. The facility is now testing the engines in the required timeframes. This had been an issue after the plant was first constructed.

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor emissions and operating information for FGEngines-S2 in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and JJJJ. The permittee shall keep records of all source emissions data and operating information on file at the facility and make them available upon request.<sup>2</sup> (40 CFR, Part 60, Subparts A & JJJJ (40 CFR 60.4245))

AQD Comment: Appears to be in COMPLIANCE. This condition basically states that the facility must maintain information on the owner/operator, address of affected source, engine information, emission control equipment, maintenance records, etc. The facility has this on-site and it was also included as part of their permit application.

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

AQD Comment: Appears to be in COMPLIANCE.

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

AQD Comment: Appears to be in COMPLIANCE. They are submitting the semi-annual reports on time.

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

AQD Comment: Appears to be in COMPLIANCE. They are submitting the annual reports on time.

## **VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. FGENGINES-S2	16.1 <sup>2</sup>	25 <sup>2</sup>	40 CFR 52.21(c) & (d)

AQD Comment: Appears to be in COMPLIANCE. The stacks appear to meet the height and dimension requirements.

**IX. OTHER REQUIREMENT(S)**

1. Within 30 calendar days of the date of permit approval, the permittee shall develop an approvable operation and maintenance plan. The plan shall be kept on site and shall contain the following information as required by 40 CFR 60.4243(b)(2)(ii)<sup>2</sup>:
  - a maintenance plan
  - records of conducted maintenance (40 CFR, Part 60, Subparts A & JJJJ(60.4243(b)(2)(ii))

AQD Comment: Appears to be in COMPLIANCE. The facility submitted an OM&M Plan and they are keeping records of conducted maintenance.

2. The permittee shall comply with the applicable requirements of 40 CFR, Part 60, Subparts A & JJJJ. (40 CFR, Part 60, Subparts A & JJJJ)

AQD Comment: Appears to be in COMPLIANCE. They appear to be complying with Subparts A and JJJJ.

After looking over the ROP requirements, staff went on a tour of the plant with Victor and Brandon where they explained operations. We then went into a storage area that houses all their spare parts. Staff noted a very small cold cleaner in this room that Victor says is serviced by Vesco every three months. The lid was closed and it had some instructions from the manufacturer posted under the lid. Staff mentioned that they will send Victor a DEQ Cold Cleaner instruction sticker to put on it or we will deliver it by hand when staff comes down for the stack test.

NANR INSPECTION CONCLUSION: The facility appears to be in COMPLIANCE with Section 2 of MI-ROP-N5432-2011 and with the requirements of the NSPS JJJJ at the present time. Staff thanked Victor and Brandon for their time and departed the facility at approximately 3:00 p.m.

NAME Matt Dahn

DATE 9-23-15

SUPERVISOR MA 9/24/2015