

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : ORCHARD HILL SANITARY LANDFILL	SRN : N5719
Location : 3290 HENNESEY RD	District : Kalamazoo
	County : BERRIEN
City : WATERVLIET State: MI Zip Code : 49098	Compliance Status : Compliance
Source Class : MAJOR	Staff : Matthew Deskins
FCE Begin Date : 3/28/2022	FCE Completion Date : 3/28/2023
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/28/2023	On-site Inspection	Compliance	Unannounced Scheduled Inspection
03/27/2023	MACT (Part 63)	Compliance	Annual NESHAP ZZZZ RICE MACT Report - The company certified that they were in compliance with all it's applicable requirements and staff did not note any issues.
03/27/2023	MACT (Part 63)	Compliance	2nd 2022 40 CFR 63 Subpart AAAA NESHAP Report and 2nd Semi-Annual Landfill Gas Treatment System Report (Jul 1, 2022 - Dec 31, 2022). No issues were noted.
03/27/2023	ROP Annual Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
03/27/2023	ROP SEMI 2 CERT	Compliance	The facility certified that no deviations occurred during the reporting period.
03/27/2023	MACT (Part 63)	Compliance	Semi-Annual NESHAP AAAA required under 40 CR 63.1981(h). This report is also required under the Federal Guidelines 40 CFR Part 62 Subpart OOO that is applicable, but the regulations allow them to report under the NESHAP AAAA if they had chosen to "Opt-In" to that regulation which they did. It appears all the required information was included in the Report and no issues were noted.

Activity Date	Activity Type	Compliance Status	Comments
03/23/2023	Stack Test	Compliance	Stack Test Report for landfill gas fired IC engines designated EUCENGINE1-S2 and EUCENGINE2-S2 (FGICEENGINES-S2) required by NSPS JJJJ. The testing was conducted in accordance with the submitted Stack Test Protocol and results indicated compliance with permitted emission limits.
03/21/2023	MAERS	Compliance	
01/11/2023	Other	Compliance	AQD Justification for not holding a Public Hearing when one was requested for the ROP Renewal.
10/20/2022	Stack Test	Compliance	Stack Test Report for landfill gas fired IC engine EUCENGINE3-S2 for Sulfur Dioxide (SO2). The testing was conducted in accordance with the submitted Stack Test Protocol and results indicate compliance with the applicable emission limit. Also, the facility operated in compliance with the permit conditions and maximum routine operating conditions for the facility.
09/21/2022	ROP Semi 1 Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
09/21/2022	MACT (Part 63)	Compliance	1st Semi-Annual LFG Treatment System Report. This report is now being submitted under 40 CFR Part 63 Subpart AAAA since the NSPS WWW is no longer applicable. This report is also required under the Federal Guidelines 40 CFR Part 62 Subpart OOO, but the regulations allow them to report under the AAAA if they had chosen to "Opt-In" to that regulation which they did.
09/21/2022	ROP Semi 1 Cert	Compliance	The facility certified that no deviations occurred during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
09/21/2022	MACT (Part 63)	Compliance	Semi-Annual NESHAP AAAA required under 40 CR 63.1981(h). This report is also required under the Federal Guidelines 40 CFR Part 62 Subpart OOO that is applicable, but the regulations allow them to report under the NESHAP AAAA if they had chosen to "Opt-In" to that regulation which they did. It appears all the required information was included in the Report and no issues were noted.
04/04/2022	ROP Annual Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
04/04/2022	ROP SEMI 2 CERT	Compliance	The facility certified that no deviations occurred during the reporting period.
04/04/2022	NSPS (Part 60)	Compliance	This/These are Semi-Annual GCCS Reports required under 40 CFR Part 60 Subpart WWW, 40 CFR Part 60 Subpart OOO, and/or 40 CFR Part 63 Subpart AAAA. New or updated landfill regulations are now in effect that ultimately replaced WWW, so moving forward, this report will be submitted strictly under 40 CFR Part 60 Subpart OOO and/or 40 CFR Part 63 Subpart AAAA. See comments made under the ROP Certification Report and also, please refer to the ROP Certification Report file for a copy of this report.
04/04/2022	ROP Annual Cert	Compliance	The facility reported a deviation for four instances when LFG Flow, KW Production, and Hours of Operation were not continuously recorded back in January of 2021 (1st Semi-Annual Reporting Period of 2021) due to an unknown interruption in their CMS Recordkeeping System. However; the longest of these instances was 4 Hours and 20 minutes and it hasn't happened again since January so staff won't consider to be a violation at the present time.
04/04/2022	ROP SEMI 2 CERT	Compliance	The facility reported that no deviations occurred during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
04/04/2022	MACT (Part 63)	Compliance	Annual NESHAP ZZZZ RICE MACT Report - The company certified that they were in compliance with all it's applicable requirements and staff did not note any issues.
04/04/2022	NSPS (Part 60)	Compliance	This is the Semi-Annual NSPS report for the LFG Treatment System. This report has a few things that need to be reported if necessary but it typically just lists the downtimes of the control system greater than one hour. NOTE: New or updated landfill regulations are now in effect that ultimately replaced WWW, so moving forward, this report will be submitted strictly under 40 CFR Part 60 Subpart OOO and/or 40 CFR Part 63 Subpart AAAA. Please see the semi-annual/annual ROP certifications for comments as well as that file for a copy of the report.
04/04/2022	MACT (Part 63)	Compliance	Semi-Annual SSM Report for the Landfill. The facility reported that 0 start-ups, 0 shutdown, and 0 malfunctions occurred during the reporting period for the GCCS or open flare (basically the open flare was shutdown during the entire semi-annual reporting period because all gas was being routed to the energy plant). They stated that no plan revisions had to be made due to actions taken during an SSM event being consistent with the SSM Plan and there were no exceedences of any applicable emission limits. NOTE: On September 27, 2021 a revised MACT AAAA took effect and it no longer requires SSM events to be recorded nor reported unless required by another rule. For a copy of the report refer to the ROP Certification File.

Activity Date	Activity Type	Compliance Status	Comments
04/04/2022	MACT (Part 63)	Compliance	This is EDL's Semi-Annual Start-Up, Shutdown, and Malfunction (SSM) Report. They stated that 2 start-ups, 2 shutdowns, and 0 malfunctions occurred during the reporting period. They further stated that corrective action taken to address them were consistent with the procedures outlined in their SSM Plan. They only have to report the events if their SSM wasn't followed in addressing them and/or an exceedance of an applicable emission limit had occurred. NOTE: On September 27, 2021 a revised MACT AAAAA took effect and it no longer requires SSM events to be recorded nor reported unless required by another rule.

Name: Matt Deskins

Date: 4-3-2023

Supervisor: *RD* 4/3/23