

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Southeast Berrien County Landfill Authority		<b>SRN :</b> N5432
<b>Location :</b> 3200 Chamberlain Rd.		<b>District :</b> Kalamazoo
		<b>County :</b> BERRIEN
<b>City :</b> BUCHANAN	<b>State:</b> MI	<b>Zip Code :</b> 49107
<b>Source Class :</b> MAJOR		<b>Compliance Status :</b> Compliance
		<b>Staff :</b> Matthew Deskins
<b>FCE Begin Date :</b> 6/19/2019		<b>FCE Completion Date :</b> 6/19/2020
<b>Comments :</b>		

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/19/2020	Scheduled Inspection	Compliance	ANNOUNCED Scheduled Inspection due to Coronavirus Pandemic.
05/04/2020	MAERS	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
04/07/2020	MACT (Part 63)	Compliance	<p>Annual RICE MACT (Subpart ZZZZ) Report. The facility has been submitting ZZZZ Annual Reports although there are no conditions currently in the ROP pertaining to Subpart ZZZZ. However, back in 2015 we had all engine plants re-do their HAP calculations because of a Formaldehyde emission issue that had come to light and it showed they were a major source of it and thus a major source of HAPs. However, AQD management had taken the following position regarding the issue: If a landfill's gas to energy facility had internal combustion engines permitted prior to the HAPs issue (Formaldehyde) becoming known and are now major for HAPs, the AQD was not going to pursue any action against them nor re-open any permits. We were only going to recommend that they raise their current stack heights and we would treat them as a major source of HAPs for any future regulations/modifications/etc. moving forward. However, if the facility submits a PTI to modify anything for the previously permitted equipment, the AQD would then address any HAP requirements at that time and include them in their revised permit. In December of 2019, the facility had to submit a PTI due to an increase in H2S concentrations in the landfill gas, so eventually the ZZZZ requirements will be included in the ROP. The company certified that they were in compliance with all the ZZZZ applicable requirements in this report, and for a copy of it, please refer to the ROP Certification file.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/07/2020	MACT (Part 63)	Compliance	NANR's Start-up, Shutdown, and Malfunction Report. They reported that there were 15 start-ups, 15 shutdowns, and 0 malfunction events that occurred but none caused an exceedance of any applicable emission limit. They certified that all actions taken to correct them were consistent with the procedures outlined in their SSM plan kept at the facility. For a copy of the report, please refer to the ROP Certification File.
04/07/2020	ROP Annual Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
04/07/2020	ROP SEMI 2 CERT	Compliance	The facility certified that no deviations occurred during the reporting period.
04/07/2020	NSPS (Part 60)	Compliance	Semi-Annual NSPS/Landfill Gas Treatment System Report. See comments made under ROP Semi-Annual and/or Annual Certification. Refer to the ROP Certification file for a copy of the report.
02/12/2020	ROP Annual Cert	Compliance	The facility reported 6 deviations for the reporting period. One was for the exceedance of permissible O2 limits in a gas well (GW-37) but it is not considered a violation since AQD staff had granted them an alternate compliance timeline. The other five deviations reported were for the open flare being down for more than one hour for various reasons such as power outages, gas system maintenance, etc. These flare downtimes are not considered violations since any type of emission exceedance cannot be determined. Also, the open flare is a back-up control device to the internal combustion engines owned by NANR and usually only runs if the plant is down. NOTE: Staff had to contact the facility and have them send another Annual ROP Certification Form. The one submitted was not signed by their approved Responsible Official. Also, the facility didn't include all the deviations that had been reported on their 1st and 2nd Semi-Annual Certifications.

Activity Date	Activity Type	Compliance Status	Comments
02/12/2020	MACT (Part 63)	Compliance	This is the semi-annual SSM report. The landfill reported that there were 6 start-ups, 6 shutdowns, and 7 malfunction events that occurred but none caused an exceedance of an applicable emission limits. They certified that all actions taken to correct them were consistent with the procedures outlined in their SSM plan kept at the facility. For a copy of the report, see the ROP Certification File.
02/12/2020	NSPS (Part 60)	Compliance	Semi-Annual NSPS Report. See comments made under ROP Semi-Annual and/or Annual Certification. Refer to the ROP Certification file for a copy of the report.
02/12/2020	ROP SEMI 2 CERT	Compliance	The facility reported 4 deviations for the reporting period. The other four deviations reported were for the open flare being down for more than one hour for various reasons such as power outages, gas system maintenance, etc. These flare downtimes are not considered violations since any type of emission exceedance cannot be determined. Also, the open flare is a back-up control device to the internal combustion engines owned by NANR and usually only runs if the plant is down. NOTE: Staff had to contact the facility and have them send another Semi-Annual ROP Certification Form. The one submitted was not signed by their approved Responsible Official.
02/06/2020	Stack Test	Compliance	Test Report for compliance testing for NOx, CO, and VOCs required by NSPS JJJJ on emission unit EUENGINE1-2. The testing was conducted in accordance with the test protocol dated March 25, 2019 and the facility was operated in compliance with the permit, at or near maximum routine operating conditions for the facility. Results indicate the engine met the compliance limits set forth by the NSPS.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	ROP Semi 1 Cert	Compliance	The facility reported a deviation for an oxygen exceedance on one of their gas wells (GW-37) that lasted longer than 15 days, however; AQD staff had approved an alternate compliance timeline for this well and supposedly it's back in compliance now. The facility also reported a deviation for the open flare being down for more than one hour on several occasions but they are not considered violations since any type of emission exceedance cannot be determined. Also, the open flare is a back-up control device to the internal combustion engines owned by NANR.
09/24/2019	MACT (Part 63)	Compliance	This is the semi-annual SSM report. The landfill reported that there were 1 start-ups, 1 shutdowns, and 4 malfunction event that occurred but none caused an exceedance of an applicable emission limits. They certified that all actions taken to correct them were consistent with the procedures outlined in their SSM plan kept at the facility. For a copy of the report, see the ROP Certification File.
09/24/2019	NSPS (Part 60)	Compliance	Semi-Annual NSPS Report. See comments made under ROP Semi-Annual and/or Annual Certification. Refer to the ROP Certification file for a copy of the report.
09/24/2019	NSPS (Part 60)	Compliance	Semi-Annual NSPS/Landfill Gas Treatment System Report. See comments made under ROP Semi-Annual and/or Annual Certification. Refer to the ROP Certification file for a copy of the report.
09/24/2019	MACT (Part 63)	Compliance	NANR's Start-up, Shutdown, and Malfunction Report. They reported that there were 5 start-ups, 5 shutdowns, and 0 malfunction events that occurred but none caused an exceedance of any applicable emission limit. They certified that all actions taken to correct them were consistent with the procedures outlined in their SSM plan kept at the facility. For a copy of the report, please refer to the ROP Certification File.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	ROP Semi 1 Cert	Compliance	The facility certified that no deviations occurred during the reporting period.
08/20/2019	Other Non ROP	Compliance	This is a report of the site-specific Total Reduced Sulfur (TRS) Concentration in the Landfill Gas at the facility. The AQD had requested that this testing be done if the facility didn't have recent site-specific data or stack test data regarding sulfur emissions. They also had to calculate their PTE for sulfur using this site specific data and if necessary, modify any current permits or apply for a permit if currently operating any equipment under an exemption. The results of this test indicate TRS levels of 948.90 ppmv and the calculated PTE for the open flare is 92.5 tons per year. The facility had installed the flare under exemption years ago but they will now be submitting a permit application for it due the PTE now being above significance levels.
08/12/2019	Stack Test	Compliance	NANR Performance Testing of their Internal Combustion Engines to determine compliance with 40 CFR Part 60 Subpart JJJJ. Results indicate that they met the CO, NOx, and VOC emission limits. Staff will consider them to be in Compliance unless TPU reviews the report and finds otherwise. (Testing was done on EUENGINE2-S2 and EUENGINE3-S2).
07/16/2019	Stack Test Observation	Compliance	Stack Test Observation on Engine #2.
07/02/2019	Stack Test Observation	Compliance	Stack Test Observation

Name: Math Dehn

Date: 6-24-20

Supervisor: RIL 6/29/20