



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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www.rapca.org

August 22, 2007

Certified Mail

Mr. Phillip Custer
Project Engineer
Springfield Gas Company, Inc.
419 Englewood Drive
Pittsburgh, PA 15237

WARNING LETTER

Dear Mr. Custer:

The Springfield Gas Company (SGC) (OhioEPA facility ID:0812710566), owns and operates emissions unit F001, Landfill Gas Active Collection System and Enclosed Flare, at the Tremont City Landfill. Springfield Gas is a gas-to-energy project that recovers landfill gas from Tremont City Landfill to sell for use as boiler fuel. On May 30, 2007, the Regional Air Pollution Control Agency (RAPCA) inspected SGC to determine compliance with all applicable emissions limits and regulations. During the inspection, it was determined that SGC has failed to operate the enclosed flare at the minimum temperature, failed to maintain wellheads under required operating parameters, failed to measure and record the percent methane sent to the enclosed flare, failed to submit annual and quarterly compliance reports, failed to submit the synthetic minor fee emissions report (SMFER).

I. Failure to maintain minimum required temperature of the enclosed flare

Pursuant to term B.5 of Permit to Install (PTI) 08-04217, modification issued January 9, 2007, the "permittee shall maintain an average combustion temperature for the enclosed flare as determined during the most recent stack test that demonstrated compliance." The minimum average combustion temperature for the enclosed flare as determined during the July 14-15, 2005 stack test is 1622 degrees Fahrenheit. A review of the enclosed flare monitoring records during the May 30, 2007 inspection indicated that in 2006 and 2007 the flare operated lower than 1622 degrees Fahrenheit. The operation of the enclosed flare below the combustion temperature, as determined during the July 2005 stack test, is a violation of PTI 08-4217 and Ohio Revised Code (ORC) 3704.05.

II. Failure to maintain wellheads under required operating parameters

Pursuant to term B.2 of PTI 08-04217, "the permittee shall operate the active collection system with a negative pressure at each wellhead..." Pursuant to term B.3 of PTI 08-04217, "the permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius and with either a nitrogen level less than 20% or an oxygen level less than 5%." The permittee may establish other operating parameters with regards to the pressure and oxygen level with supporting data. During the May 30, 2007 inspection, it was determined that SGC operates numerous wellheads at positive pressure and an oxygen level greater than 5%. This is also documented in the 2006 first and

second quarterly deviation reports submitted by SGC. SGC has not requested alternative operating parameters or submitted supporting data to indicate that other operating parameters are warranted. Failure to maintain the minimum required operating parameters of the wellheads is a violation of PTI 08-4217 and ORC 3704.05.

III. Failure to measure and record the percent methane

Pursuant to term C.4.a of PTI 08-04217, the permittee shall install a "methane measuring device that provides a measurement of the percent methane by volume at the fuel inlet to the flare and shall be read and recorded every fifteen minutes." During the May 30, 2007 inspection, SGC had no records documenting that the percent methane at the fuel inlet to the flare had been recorded. Failure to monitor and record the percent methane at the fuel inlet is a violation of PTI 08-4217 and ORC 3704.05.

IV. Failure to submit required quarterly and annual reports

Pursuant to term D.1 of PTI 08-04217, "the permittee shall submit quarterly deviation (excursion reports..." by January 31, April 30, July 31, and October 31. Pursuant to term D.2, "the permittee shall submit an annual report, by January 31 of each year..." To date, no reports have been received by RAPCA since October 2006. SGC is delinquent in submitting the quarterly reports for 2006 4th quarter, the 2007 1st - 2nd quarter reports, and the 2006 annual report. Failure to submit required reports is a violation of PTI 08-04217 and ORC 3704.05.

VII. Failure to submit Synthetic Minor Fee Emission Report

Pursuant to Ohio Administrative Code (OAC) rule 3745-78 and ORC 3745.11, SGC is required to submit a SMFER reporting the actual annual emissions from the facility of particulate matter, sulfur dioxide, nitrogen oxides, organic compounds, and lead. The SMFER for 2006 was due by April 15, 2007. To date, this report has not been submitted to Ohio EPA. Failure to submit the SMFER is a violation of OAC rule 3745-78 and ORC 3645.11.

In order to address the above violations, RAPCA is requesting that SGC submit a compliance plan. This compliance plan shall address the operating temperature of the enclosed flare, the operating parameters of the wellheads, the percent methane monitoring, and all delinquent reports. This compliance plan shall be submitted within 30 days of receipt of this letter.

If you have any questions concerning this matter, please contact me at 937-225-4004.

Sincerely,



Eileen C. Moran
Air Pollution Control Specialist

cc: Jefferis Canan, RAPCA
Lisa Holscher, USEPA
Tom Kalman, OEPA

22 AUG 2007 PM 3:1

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 419 ENGLEWOOD DR
 PITTSBURGH, PA 15237

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