

B6237
maula
Washtenaw

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : YPSILANTI COMM. UTILITIES AUTHORITY		SRN : B6237
Location : 2777 STATE RD		District : Jackson
		County : WASHTENAW
City : YPSILANTI	State: MI	Zip Code : 48198
Source Class : MINOR		Staff : Diane Kavanaugh-Vetort
FCE Begin Date : 11/15/2014		FCE Completion Date : 12/15/2015
Comments : Major ROP Source FCE. Source is minor for all pollutants; major ROP due to NSPS applicability Sewage Sludge Incinerator.		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/15/2015	Scheduled Inspection	Compliance	Complete scheduled inspection in conjunction with Performance Stack Testing. ROP Major Source. Fluidized bed sewage sludge incinerator, Municipal Waste Water Treatment Plant.
12/15/2015	Stack Test Observation	Compliance	ROP major Source. Municipal WWTP, Sewage Sludge Incinerator: fluidized bed. Required performance testing in accordance with federal NSPS Subpart M (4M). AQR observed first of two days of testing. TPU David Patterson scheduled to observe on second day. All pollutants are also limited in ROP and it also requires periodic testing. Operating parameters are to be set and monitored based on 4M compliance.
11/13/2015	Telephone Notes		Summary of action items and pending issues: Called Luther to discuss and obtain updates on various regulatory items.

Activity Date	Activity Type	Compliance Status	Comments
11/09/2015	NSPS (Part 60)	Compliance	<p>40 CFR Part 60 Subpart M required report pursuant to 60.5200 (a), (d), and (g). Ash Handling system operating procedure monitoring plan. Required to be submitted to EPA/AQD 60 days prior to required performance test. YCUA test is scheduled for December 15-16. YCUA conducted Method 22 VE observation on October 6-7, 2015 (3) 1 hour observation periods are indicated in Table 2 of standard. YCUA process is a slurry of ash/effluent water discharged to two lagoons. There are no fugitive emissions. Submittal is placed in plant file.</p>
10/14/2015	Other	Compliance	<p>SUMMARY EMAIL CORRESPONDENCE RELATED TO YCUA REPORTED HIGH CHROMIUM SLUDGE SAMPLE COLLECTED AUGUST 27, 2015. Reported anomaly of Chromium conc. in biosolids (sewage sludge) analytical data of 660 mg/kg dry. Limits: Total Chromium 450 mg/kg dry sewage sludge (instantaneous) and 4.5E-2 lb/ton dry sewage sludge emission limit. Re-test and additional test done. Identified source after investigation - sludge from former YCUA plant (closed at Willow Run). SEE EMAILS in file.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2015	ROP Semi 1 Cert	Compliance	<p>First ROP 1st Semi-annual Certification & Deviation report. Initial ROP effective 3/17/2015. Rec'd timely. Acceptable. Report 1 deviation but numerous instances: SSI O2% a large number of exceedances and long durations. Reference test from July 2006 for the value (allowed +3%). Most recent test was May 6, 2015 and average oxygen content in the incinerator exhaust gas measured/result was 8.77% O2. If use this value = less deviations. Subpart O requirement & says "based on the most recent compliant test". Not clear to YCUA or AQD if can use any other testing. YCUA proposing to determine during MMMM December testing. Sent EPA 30 day test notice & state plan to re-establish.</p>
08/03/2015	Stack Test	Compliance	<p>Emissions Test Report to evaluate compliance of EU-FBSSI incinerator WWTP. ROP Certification was attached. Tested emissions for lead (Pb), mercury (Hg), particulate (PM), nitrogen (NOx) and carbon monoxide (CO). CO, PM and Hg are required by ROP. Tom Maza reviewed results (see EM Tab). Testing was conducted in accordance with the submitted test plan and facility operated in compliance with permit conditions or at the maximum operating conditions for the facility. CO and NOx results are based on 2 runs. Testing is required every 5 yrs. Composite biosolids sample was taken and analyzed during test. Compliant</p>
05/06/2015	Scheduled Inspection	Compliance	<p>Scheduled inspection, in conjunction with stack testing. YCUA staff : Luther Blackburn, and Alan Schock; AQD staff : Scott Miller, Diane Kavanaugh Vetort, Tom Gasloli, and myself. Tom was auditing the stack testing performed by Bureau Veritas : Thomas Schmelter.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/14/2015	MAERS	Compliance	ROP Cert 3-16-15. Audited successfully. Several EUs were removed as they were not sources of reportable emissions, only "odor control" structures associated with the incinerator: EU-FBSSI. Also, a few portable generators were found to not be MAERS reportable. Appears accurate and complete.
03/31/2015	NSPS (Part 60)	Compliance	Subpart Mmmm Final Control Plan received 3-21-15 as requested by AQD letter of 1-30-15. Final Control Plan appears to adequately address the elements of the AQD request in regards to showing that company will be able to show compliance w/Mmmm by 3-21-16.

Name: *Diana K. Vetter* Date: *1/14/16* Supervisor: _____