

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : EQ-Belleville (MDWTP, WER, WDI (Site 1&2, FOW)	SRN : M4782
Location : 49350 N. I 94 SERVICE DR	District : Detroit
	County : WAYNE
City : BELLEVILLE State: MI Zip Code : 48111	Compliance Status : Compliance
Source Class : MAJOR	Staff : C. Nazaret Sandoval
FCE Begin Date : 4/29/2014	FCE Completion Date : 4/29/2015
Comments : FCE for FY 2015. Site visits conducted on 4/2/15 and 4/29/15. At the time of this FCE, the facility appears to be operating in compliance with the cited conditions of permit No. MI-ROP-M4782-2010a that were evaluated during the inspection.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
04/29/2015	Scheduled Inspection	Compliance	FY 2015 Targeted Inspection - The inspection was conducted in two-days. Day 1 - April 2, 2105: Evaluation of compliance with the monitoring and recordkeeping special conditions specified on MI-ROP-M4782-2010a (Emphasis on Section 1 of ROP). Evaluation/discussion of some of the back-up calculations submitted with the 2014 MAERS report. Day 2 - April 29, 2015: Facility tour and evaluation of compliance with special conditions of ROP Section 2.
04/03/2015	Other	Compliance	Evaluation of the ROP Deviation Report for period July to December 2014 received by AQD on March 13, 2015 / Section 1, MDWTP FG East . For details about the deviations and corrective actions, please refer to CA M478231564
03/15/2015	MACT (Part 63)	Compliance	Semi-annual report (2nd half 2014) SSM Plan Report per 40 CFR 63, Subpart AAAA- Wayne Energy reported that they followed the SSM plan for all instances of engines malfunction. The source did not exceed any of the emission limitations
03/13/2015	ROP Annual Cert	Compliance	2014 Annual ROP Certification for Section 1 received on time. For deviations details refer to the semi

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03/13/2015	ROP Annual Cert	Compliance	2014 Annual ROP Certification for Section 2 received on time. For deviations details refer to the semi-annual reports
03/13/2015	ROP Annual Cert	Compliance	2014 Annual ROP Certification for Section 3 received on time.
03/13/2015	ROP SEMI 2 CERT	Compliance	Deviations reported for period July to December 2014. There were 2 incidents reported at the East Treatment Building (FGEast): 1) Caustic Scrubber Flow rate was below 225 GPM on 10/06 /14 from 0.29 AM to 8:19 AM 2) The scrubber pH reading on 11/25/14 was below the lower permitted limit. The pH reading was 7.2 from 0:37 to 6:34 AM The problems were addressed by the facility and the incidents did not cause exceedances or monitoring downtimes. Therefore, no violation were issued. For details about these incidents refer to MACES activity report M478231564
03/13/2015	ROP SEMI 2 CERT	Compliance	ROP Semi-annual report for Section 2 - Postmarked 3/13/15 - No deviation reported for period 01/01/14 to 12/31/14
03/13/2015	ROP SEMI 2 CERT	Compliance	ROP Semi-annual report for Section 3 - Postmarked 3/13/15 - No deviation reported for period 07/01/14 to 12/31/14
03/13/2015	MAERS	Compliance	MAERS report for emission year 2014 was timely submitted online. Report was audited and passed audit. For audit details refer to MACES activity report CA M478231542
03/13/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form for Section 1
03/13/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form for Section 2
03/13/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form for Section 3

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03/13/2015	MACT (Part 63)	Compliance	MDI RTO Semi-Annual Planned Routine Maintenance Report pursuant to off site NESHAP (40 CFR 63.697 and 40 CFR 264 Subpart CC) - Period 7/01/14 to 12/31/14 - Postmarked 3/13/15 AQD reviewed and evaluated the report and found that a great portion the incidents causing RTO downtime during this period was due to "Power Loss from Edison". Since EQ does not have control over it, AQD is not taking action. In addition, the facility does not treat waste while the RTO is down; therefore, the facility was not in violation of any emission limits during the time the RTO was down. For details about the actual RTO downtime records submitted to AQD and the evaluation of the data, please refer to MACES report M478231364
03/13/2015	MACT (Part 63)	Compliance	Semiannual report for ROP Section 2 - Wayne Energy Recovery RICE - 40 CFR 63, Subpart ZZZZ for period 07/1/14 to 12/31/14. Postmarked 9/15/14. There were no deviations reported. Engines 2 and 5 were tested on July 23, 2014 in accordance with the RICE regulations and passed.
03/13/2015	NSPS (Part 60)		ROP Section 3 -Semi annual report for Wayne Disposal Landfills (2nd half 2014) Postmarked 3/13/15 AQD does not have delegation of authority to implement the Federal Plan provisions applicable to the landfills (40 CFR part 62 subpart GGG). (40 CFR Part 60 subpart WWW applies by citation in Part 62.) EPA Region V makes compliance determination.
03/13/2015	MACT (Part 63)	Compliance	ROP Section 1, S.C. VI.8 - MACT report pursuant 40 CFR Part 63 Subpart DD (Off-site waste treatment) - Reporting period 07/01/14 to 12/31/14, postmarked 3/13/15
03/03/2015	NESHAP (Part 61) ,	Compliance	Annual Report in compliance with Part 61 Subpart FF Benzene NESHAP - No deviations reported

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01/14/2015	NESHAP (Part 61)	Compliance	MDWTP - Fourth Quarter 2014 - Part 61 , Subpart FF (Benzene NESHAP) One of the records for Benzene Waste Operations shows a "Receipt Date" listed as 6/12/1998. I contacted the facility to clarify that entry and I was told that it was an error . They discovered the error when working in the annual report and it was corrected prior reporting the TAB.
09/29/2014	Other	Compliance	Evaluation of the ROP Deviation Report for period 01/01/14 to 06/30/14 received by AQD on 09/15/14, Section 1, MDWTP FG East . For details about the deviations and corrective actions, please refer to CA M478231563
09/15/2014	NSPS (Part 60)		ROP Section 3 - Semi annual report for Wayne Disposal Landfills (1st half 2014) Postmarked 9/15/14 AQD does not have delegation of authority to implement the Federal Plan provisions applicable to the landfills (40 CFR part 62 subpart GGG). (40 CFR Part 60 subpart WWW applies by citation in Part 62.) EPA Region V makes compliance determination.

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09/15/2014	MACT (Part 63)	Compliance	MDI RTO Semi-Annual Planned Routine Maintenance Report pursuant to off site NESHAP (40 CFR 63.697 and 40 CFR 264 Subpart CC) - Period 01/01/14 to 6/1/14 - Postmarked 9/15/14 AQD reviewed and evaluated the report and found that a great portion the incidents causing RTO downtime during this period was due to "RTO fault" and the causes have not been explained . The failures translated into 75 hrs. and 21 minutes of RTO downtime, which accounted for 56% of the total downtime hours for the evaluated period . AQD will discuss and further evaluate the facility's preventive maintenance (PM) and malfunctioning abatement plan (MAP). AQD is using enforcement discretion and a violation notice will not be issued at this time. The facility does not treat waste when RTO is down. No emission limits has been exceeded. For details about the records submitted by EQ and the evaluation conducted by AQD, refer to MACES report CA M478231365
09/15/2014	MACT (Part 63)	Compliance	Semiannual Report for ROP Section 2 - Wayne Energy Recovery RICE - 40 CFR 63, Subpart ZZZZ - for period 01/01/14 to 06/30/2014. Postmarked 9/15/14. There were no deviations reported. Engines 2 and 5 were tested in accordance with the RICE regulations on July 23, 2014 and passed the testing
09/15/2014	MACT (Part 63)	Compliance	MACT report pursuant 40 CFR Part 63 Subpart DD (Off-site waste treatment) - ROP Section 1, S.C. VI.8 , reporting period 1/1/14 to 6/30/14, postmarked 9/15/14

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09/15/2014	ROP Semi 1 Cert	Compliance	<p>ROP Section 1 Semiannual Report postmarked 9/15/14 - Deviations for Period January to June 2014.</p> <p>There were two reported deviation for the first half of 2014 at the East Treatment Building (FGEast):</p> <p>1) The air flow through the RTO was not within the permitted range.</p> <p>2) The pH in the scrubber was not within the permitted range</p> <p>The problems were addressed by the facility and the incidents did not cause exceedances or monitoring downtimes. Therefore, no violation were issued.</p> <p>For details about these incidents refer to MACES activity report M478231563</p>
09/15/2014	MACT (Part 63)	Compliance	<p>ROP Section 2 semi-annual report (1st half of 2014) - SSM Plan Report per 40 CFR 63, Subpart AAAA - Wayne Energy reported that they followed the SSM plan for all instances of engines malfunction. The source did not exceed any of the emission limitations</p>
09/15/2014	ROP Semi 1 Cert	Compliance	<p>ROP Section 2 semiannual report for period 1/1/14 to 6/30/14 received on 9/15/14. No reported deviations.</p>
09/15/2014	CAM Excursions/Exceedances	Compliance	<p>ROP Sections 1, 2 and 3 - CAM monitor downtime and excursion/exceedance report for period 1/1/14 to 6/30/14 postmarked 9/15/14</p> <p>No reported downtime, excursions or exceedances</p>
09/15/2014	ROP Semi 1 Cert		<p>ROP Section 3 Semiannual Report for period 1/1/14 to 6/30/14 postmarked 9/15/14.</p> <p>Deviation reported for EUVent Flare and EUALCS - These emission units are part of the Landfill at Wayne Disposal - ROP - Section 3 . DEQ -AQD does not have the authority to regulate 40 CFR Part 62 ,Subpart GGG landfills . The active hazardous waste landfill is also beyond the jurisdiction of AQD because it is not subject to the NSPS WWW, MACT provisions or any permitting from AQD.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/22/2014	Stack Test	Compliance	<p>On 8/18/14 AQD received test report prepared by Derenzo and Associates, Inc. for the verification of CO emissions from landfill gas-fueled engines at Wayne Energy Recovery. The testing was performed on July 23, 2014 in accordance with the test protocol dated 2/5/14 and additional comments cited on AQD approval letter dated 3/19/14.</p> <p>The test proceeded in compliance with the testing requirements of 40 CFR Part 63, Subpart ZZZZ and a certification form signed by the responsible official was attached to the cover letter submitted with the stack test report.</p> <p>The results showed noticeable differences in the measured CO outlet concentrations for each engine, due to the catalyst service life. Engine 2 catalyst has been in service longer than Engine 5 catalyst and the catalyst at Engine 5 had been replaced recently .</p> <p>Therefore, the CO emissions were considerably higher for Engine 2. However, for both tested engines, the results showed compliance with the CO emission limit of 177 ppmvd @ 15% O₂ .</p> <p>The average CO emissions from the 3-Runs (60-min/run) were as follows: Engine 2 =113 ppmvd and Engine 5 = <0.1 ppmvd.</p>

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07/23/2014	Stack Test Observation	Compliance	<p>Witness the CO emission test conducted on two Caterpillar G-398 SI RICE Engines at Wayne Energy Recovery facility. The test was conducted in compliance with 40 CFR Part 63 Subpart ZZZZ [63.6603(a)]. Engines 2 and 5, rated at 500 HP were tested. The test was performed in accordance with the approved AQD test plan (approved on March 19, 2014). The test included 3- runs of 60 minutes/run, for each engine. AQD inspector witnessed the test for engine No. 2 from 1:13 PM to 4:43 PM and verified that the engine operating conditions (engine output in KW, fuel CH4 %, and temperature of the exhaust at the catalyst inlet) were recorded. The load was kept within 10% of the maximum load. The CO emissions (in ppmv) and the actual O2 % were observed for Engine 2. It appears as if the CO emissions are in compliance with the regulated limits. A report with the results of testing will be submitted to AQD by Derenzo and Associates within 30 days after the test.</p>
06/03/2014	MAERS	Compliance	<p>The MAERS emission reports was audited. There was an error in the reporting of VOC emmissions, which were abnormally high for this source. I informed the permittee about the error and corrected the entry on the MAERS database. Audit passed with no further comments.</p>

Name: G. Andoval Date: 9/30/15 Supervisor: JK