

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Lyon Development, Inc.	SRN : N2803
Location : 5380 S. MILFORD RD.	District : Southeast Michigan
	County : OAKLAND
City : NEW HUDSON State: MI Zip Code : 48165	Compliance Status : Compliance
Source Class : MAJOR	Staff : Rebecca Loftus
FCE Begin Date : 6/28/12	FCE Completion Date : 8/13/2015
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/13/2015	Scheduled Inspection	Compliance	
05/04/2015	MAERS	Compliance	MAERS Report: Lyon Development is a closed landfill. Sections One and Two of the ROP were voided on April 16, 2014. I updated the source and fee categories to reflect the change from Major to Minor source and to no fee (no longer NSPS subject) for their 2014 MAERS. Audit complete; no changes made. Reviewed by R. Loftus.
04/13/2015	ROP Other	Compliance	MAERS ROP Certification for Section 1, received on time: 3/12/15. Reviewed by R. Loftus
04/13/2015	ROP Annual Cert	Compliance	Final Annual Report; Section 2 of the ROP was also voided on April 16, 2014. The Electric facility did not operate in 2014. The one deviation was previously reported and was the result of the facility not retaining operating data for 5 years as required by their permit. Report reviewed by R. Loftus
04/13/2015	ROP Other	Compliance	MAERS ROP Certification for Section 2, received on time: 3/13/15. Reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
04/13/2015	ROP Annual Cert	Compliance	Final Annual Report: The landfill closed in 1993 and the ROP was voided on April 16, 2014. Because the ROP was voided in 2014, this report only covers the time period of January 1, 2014 through April 16, 2014; the details are the same as previously described in the Semi-Annual report received on 9/12/14. Report reviewed by R. Loftus
09/25/2014	MACT (Part 63)	Compliance	Final SSM Report: The Landfill has been closed since 1993 and the ROP was voided on April 16, 2014. This report covers the period from January 1, 2014 through April 16, 2014. During the reporting period there were seven malfunction events: 4 power outages, 1 transformer failure, and 2 well field leaks. Lyon Development believes the responses to these events were all consistent with the procedures listed in the SSM Plan. Report reviewed by R. Loftus
09/25/2014	ROP Semi 1 Cert	Compliance	Final Semi-Annual Deviation Report: The landfill is a closed and the ROP was voided on April 16, 2014. This report covers the period from January 1, 2014 through April 16, 2014. During this reporting period two deviations were reported. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. On May 14, 2014, the facility submitted an alternative timeline and/or operating scenario to address the exceedances in these wells. The second deviation was for Flare down time; these down times were due to a utility outage, transformer failure, and air leak in well field; all events were addressed in accordance with the SSM Plan and the flare was restarted each time. Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
09/15/2014	ROP Semi 1 Cert	Compliance	The Electric facility did not operate from January 1, 2014, through June 30, 2014. The deviation was previously reported and was the result of the facility not retaining operating data for 5 years as required by their permit. The deviation is being reported since the required records retention time is 5 years. -R. Loftus
09/15/2014	MACT (Part 63)	Compliance	Semi-Annual Startup, Shutdown, Malfunction Report: No SSM events occurred during the reporting period. -R. Loftus
03/25/2014	MAERS	Compliance	No changes were made to the submitted MAERS report. Engines were not run during the 2013 calendar year.
03/25/2014	MAERS	Compliance	No changes were made to the submitted MAERS report. Engines were not run during the 2013 calendar year.

Activity Date	Activity Type	Compliance Status	Comments
03/17/2014	ROP Annual Cert	Compliance	<p>The facility reported 2 deviations during the July 1, 2013, through December 31, 2013, reporting period. The first deviation was for oxygen exceedances in Well 61 which could not be corrected within 15 days of the initial exceedance. The facility submitted and received an alternative timeline and/or alternative operating scenario to address the exceedances in this well. The second deviation was for 1 flare outage lasting longer than 1 hour in duration due to routine maintenance.</p> <p>The facility reported 3 deviations during the January 1, 2013, through June 30, 2013, reporting period. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. The facility submitted and received an alternative timeline and/or alternative operating scenario to address the exceedances in these wells. In addition, the facility submitted a notification of an expansion of the the wellfield in June 17, 2013, which involved the replacement of the lateral to Well 57R. The second deviation was for 2 flare outages lasting longer than 1 hour in duration. The cause, duration, and date of the flare outages are listed in Table 3 of the seminannual report. The final deviation was for one instance in which the flare flow and temperature data was not recorded every 15 minutes. The data was not recorded for 27 hours 28 minutes starting on June 25, 2013, as a result of fuses being tripped on a utility pole servicing the chart recorder. Once the problem was discovered, the fuse was replaces and the chart recorder began operating without incident.</p>
03/17/2014	ROP SEMI 2 CERT	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
03/17/2014	MACT (Part 63)	Compliance	The facility reported 3 startup, 3 shutdown, and no malfunctions during the July 1, 2013, through December 31, 2013, reporting period. The actions taken in response to the SSM events are consistent with the site's SSM Plan and no revisions to the the SSM Plan were made during the reporting period.
01/30/2014	ROP Annual Cert	Compliance	Facility did not operate from January 1, 2013, through December 1, 2013. The one deviation cited in the report was previously reported and was the result of the facility not retaining operating data for 5 years in duration. The deviation is being reported since the required records retention time is 5 years.
01/30/2014	ROP SEMI 2 CERT	Compliance	Facility did not operate from July 1, 2013, through December 1, 2013. The one deviation cited in the report was previously reported and was the result of the facility not retaining operating data for 5 years in duration. The deviation is being reported since the required records retention time is 5 years.
01/30/2014	MACT (Part 63)	Compliance	No SSM events occurred during the reporting period.
09/16/2013	ROP Semi 1 Cert	Compliance	Facility did not operate from January 1, 2013, through June 20, 2013. The deviation was previously reported and was the result of the facility not retaining operating data for 5 years in duration. The deviation is being reported since the required records retention time is 5 years.

Activity Date	Activity Type	Compliance Status	Comments
09/16/2013	ROP Semi 1 Cert	Compliance	<p>The facility reported 3 deviations during the January 1, 2013, through June 30, 2013, reporting period. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. The facility submitted and received an alternative timeline and/or alternative operating scenario to address the exceedances in these wells. In addition, the facility submitted a notification of an expansion of the the wellfield in June 17, 2013, which involved the replacement of the lateral to Well 57R. The second deviation was for 2 flare outages lasting longer than 1 hour in duration. The cause, duration, and date of the flare outages are listed in Table 3 of the seminannual report. The final deviation was for one instance in which the flare flow and temperature data was not recorded every 15 minutes. The data was not recorded for 27 hours 28 minutes starting on June 25, 2013, as a result of fuses being tripped on a utility pole servicing the chart recorder. Once the problem was discovered, the fuse was replaces and the chart recorder began operating without incident.</p>
09/11/2013	MACT (Part 63)	Compliance	<p>The facility reported 4 startup, 3 shutdown, and 1 malfunction event during the January 1, 2013, through June 30, 2013, reporting period. The date, duration, and description of the malfunction event is listed in Table 1 of the SSM Report. The actions taken in response to the SSM events ere consistent with the site's SSM Plan. No revisions to the the SSM Plan were made during the reporting period.</p>
04/17/2013	MAERS	Compliance	<p>CO emissions in EUFLARE were mistakenly reported in tons instead of pounds. I changed the CO emissions from 16.42 pounds to 32841 pounds EUFLARE.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/15/2013	ROP SEMI 2 CERT	Compliance	<p>The facility reported 2 deviations during the July 1, 2012, through December 31, 2012, reporting period. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. The facility submitted and received an alternative timeline to correct the exceedances in these wells. The second deviation was for 8 flare outages lasting longer than 1 hour in duration. The cause, duration, and date of the flare outages are listed in Table 3 of the semiannual report.</p>
04/15/2013	NSPS (Part 60)	Compliance	<p>For the July 1, 2012, through December 31, 2012, reporting period, the facility properly reported instances in which positive pressures occurred at monitoring wells, the times at which the oxygen content within the monitoring wells was higher than 5%, the periods in which landfill gas was diverted away from the control device, a summary of any surface methane exceedances, and the SSM events which occurred during the reporting period. All of this information is required by NSPS Subpart WWW.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/15/2013	ROP Annual Cert	Compliance	<p>The facility reported 3 deviations during the January 1, 2012, through June 30, 2012, reporting period. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. The facility submitted and received alternative timelines to correct the exceedances in these wells. The second deviation was for 2 flare outages lasting longer than 1 hour in duration. The cause, duration, and date of the flare outages are listed in Table 3 of the seminannual report. The third deviation occurred on March 2, 2012, when the valve closing mechanism servicing the open flare failed to properly close. This occurred at a time in which there was a power outage at the site. The backup battery designed to provide power to the valve which controls flow to the flare was in need of replacement and, therefore, the flow to the flare was not shut off. This resulted in possible uncombusted landfill gas being emitted to the atmosphere during this time period. As a result of this occurrence, a replacement schedule has been put into place to replace the backup battery on an annual basis.</p> <p>The facility reported 2 deviations during the July 1, 2012, through December 31, 2012, reporting period. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. The facility submitted and received an alternative timeline to correct the exceedances in these wells. The second deviation was for 8 flare outages lasting longer than 1 hour in duration. The cause, duration, and date of the flare outages are listed in Table 3 of the seminannual report.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/15/2013	ROP Annual Cert	Compliance	Facility did not operate during 2012.
04/15/2013	ROP SEMI 2 CERT	Compliance	Facility did not operate from July 1, 2012, through December 31, 2012.
04/15/2013	MACT (Part 63)	Compliance	Facility did not operate during 2012. Therefore, no SSM events occurred during the reporting period.
04/15/2013	MAERS	Compliance	Facility did not operate during 2012. Therefore, no air emissions were reported.
04/15/2013	MACT (Part 63)	Compliance	The facility reported 11 startup, 6 shutdown, and 5 malfunction events during the July 1, 2012, through December 31, 2012, reporting period. The date, duration, and description of the malfunction event is listed in Table 1 of the SSM Report. The action taken in response to the SSM events was consistent with the site's SSM Plan. No revisions to the the SSM Plan were made during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
09/21/2012	ROP Semi 1 Cert	Compliance	<p>The facility reported 3 deviations during the January 1, 2012, through June 30, 2012, reporting period. The first deviation was for pressure and/or oxygen exceedances in several wells which could not be corrected within 15 days of the initial exceedance. The facility submitted and received alternative timelines to correct the exceedances in these wells. The second deviation was for 2 flare outages lasting longer than 1 hour in duration. The cause, duration, and date of the flare outages are listed in Table 3 of the semiannual report. The third deviation occurred on March 2, 2012, when the valve closing mechanism servicing the open flare failed to properly close. This occurred at a time in which there was a power outage at the site. The backup battery designed to provide power to the valve which controls flow to the flare was in need of replacement and, therefore, the flow to the flare was not shut off. This resulted in possible uncombusted landfill gas being emitted to the atmosphere during this time period. As a result of this occurrence, a replacement schedule has been put into place to replace the backup battery on an annual basis.</p>
09/21/2012	NSPS (Part 60)	Compliance	<p>For the January 1, 2012, through June 30, 2012, reporting period, the facility properly reported instances in which positive pressures occurred at monitoring wells, the times at which the oxygen content within the monitoring wells was higher than 5%, the periods in which landfill gas was diverted away from the control device, a summary of any surface methane exceedances, and the SSM events which occurred during the reporting period. All of this information is required by NSPS Subpart WWW.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/21/2012	MACT (Part 63)	Compliance	The facility reported 3 startup, 3 shutdown, and 1 malfunction event during the January 1, 2012, through June 20, 2012, reporting period. The date, duration, and description of the malfunction event is listed in Table 1 of the SSM Report. The action taken in response to the SSM events was consistent with the site's SSM Plan. No revisions to the the SSM Plan were made during the reporting period.
09/12/2012	ROP Semi 1 Cert	Compliance	The facility reported 1 deviation during the January 1, 2011, through December 31, 2011, reporting period. The deviation was previously reported and dealt with the failure to maintain operating data for 5 years. The facility has taken appropriate action to ensure that operational records are maintained for 5 continuous years in the future. This deviation will be reported for the next 3 calendar years since the last record of not continuously maintaining operational data for 5 years occurred on December 3, 2007. It should be noted that the facility has not operated for over a year.
09/12/2012	MACT (Part 63)	Compliance	Facility reported no SSM events during the January 1, 2012, through June 30, 2012, reporting period. The facility has not operated for more than a year.

Name:

Rebecca J. [Signature]

Date:

9/9/15

Supervisor:

CJE