

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Ottawa County Farms Landfill	SRN : N3294
Location : 15550 68th Avenue	District : Grand Rapids
	County : OTTAWA
City : COOPERSVILL E	State: MI Zip Code : 49404 Compliance Status : Compliance
Source Class : MAJOR	Staff : David Morgan
FCE Begin Date : 09/01/2019	FCE Completion Date : 9/30/2020
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	NSPS (Part 60)	Compliance	Annual Liquids reporting per subpart XXX
09/30/2020	NSPS (Part 60)	Compliance	Postmarked 9-15-20 Semiannual Compliance for Subpart WWW and XXX. The company fulfilled its semiannual NSPS report responsibilities.
09/30/2020	ROP Semi 1 Cert	Compliance	Postmarked 9-15-20 The company reported three types of deviations. Two wells (SC1 and SC2) exhibited high O2, not resolved in 15 days. These were resolved. Four wells (EW65A, EW79A, EW90A and EW97B) had pressure exceedances not resolved in 15 days, which were resolved by replacing lateral lines. Alternate timelines were ultimately approved by AQD. For EUENCLSDFLARE, there were 3 instances when the flow meter did not record data due to a power surge. The flare was operational during these times. No surface emission monitoring exceedances during the reporting period. All deviations resolved, no violation warranted at this time. Original signatures for the responsible official were provided.

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	MACT (Part 63)	Compliance	Postmarked 9-15-20 - Semiannual Compliance with Subparts A and AAAA and SSM Plan. MI-ROP-N3294-2019. SSM Report (Subpart AAAA)- During the reporting period, there were 23 startup, 22 shutdown and 1 malfunction events documented. The company indicated that all provisions of the SSM Plan were followed during the reporting period. SSM records are maintained on site and no changes were made to the plan. For the malfunction, a power surge affected the flow recorder for 32 hours.
09/30/2020	ROP Semi 1 Cert	Compliance	Postmarked 9-15-20 No deviations reported. Original signature from responsible official provided. It is noted that there were 52 instances at Plant 1 and 16 instances at Plant 2 where the treatment system was down for more than one hour. Many of these were the result of loss of power and system leaks. Although OCFL has a back-up flare which controls gas in the event of treatment system downtime, there are many more downtime events than reported in the last certification report. Follow-up will be made with EDC.
09/30/2020	MACT (Part 63)	Compliance	Postmarked 9-15-20 - Semiannual Compliance with Subparts A and AAAA and SSM Plan. MI-ROP-N3294-2019. SSM Report (Subpart AAAA)- During the reporting period, there were 50 startup, 5 shutdown and 45 malfunction events documented. The company indicated that all provisions of the SSM Plan were followed during the reporting period. SSM records are maintained on site and no changes were made to the plan.
09/23/2020	Scheduled Inspection	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
09/18/2020	Stack Test	Compliance	A stack test report was received for the EDC. The test was conducted per ROP No. MI-ROP-N3294-2019, EURICEENGINE7, Special Condition No. V.1 and 40 CFR Part 60, Subpart JJJJ. NOx emissions were 1.97lb/hr (4.92 lb/hr limit) and 0.40 g/bhp-hr (1.0 g/ghp-hr limit); CO emissions were 14.7 lb/hr (16.2 lb/hr limit) and 2.98 g/bhp-hr (3.30 g/bhp-hr limit); and VOC emissions were 1.0 lb/hr (3.2 lb/hr) and 0.20 g/bhp-hr (0.65 g/bhp-hr limit). All emissions were within applicable limits. Testing was performed at 1,599kW for the test period. Maximum operating is 1,600 kW +/- 10%)
05/19/2020	MAERS	Compliance	ROP Certification form for MAERS for Section 2 received on 3/12/20 - Section 1 received 3/16/20. This MAERS is acceptable. -DLM
04/10/2020	ROP Annual Cert	Compliance	Original signature from responsible official provided. All deviations reported as appropriate.
04/10/2020	NSPS (Part 60)	Compliance	Postmarked 3-13-20 - Semiannual Compliance for Subpart WWW and XXX. The company fulfilled its semiannual NSPS report responsibilities.
04/10/2020	ROP SEMI 2 CERT	Compliance	The company reported two types of deviations. The there were six wells that exhibited oxygen or pressure exceedances that could not be resolved in 15 days. In all cases, the company took corrective actions including installing new wells and re-drilling others. Alternate timeline approvals were approved by AQD. In addition, there were four times where the flare flow meter did not properly record every 15 minutes. This was due to power outages and all were resolved. Original signatures for the responsible official were provided.
04/10/2020	ROP Annual Cert	Compliance	No deviations reported. Original signature from responsible official provided.

Activity Date	Activity Type	Compliance Status	Comments
04/10/2020	MACT (Part 63)	Compliance	Semiannual SSM report per Subparts WWW, A and AAAA. Semiannual Compliance with Subparts A and AAAA and SSM Plan. During the reporting period, there were 49 startup, 4 shutdown and 47 malfunction events documented. The company indicated that all provisions of the SSM Plan were followed during the reporting period. SSM records are maintained on site and no changes were made to the plan.
04/10/2020	ROP SEMI 2 CERT	Compliance	No deviations reported. Original signature from responsible official provided.
04/10/2020	MACT (Part 63)	Compliance	Annual Compliance with Subpart ZZZZ. The company had no deviations and reported fuel flow for each engine in accordance with Subpart ZZZZ.
11/13/2019	ROP Semi 1 Cert	Compliance	No deviations reported. Original signature from responsible official provided. It is noted that there were 9 instances at Plant 1 and 3 instances at Plant 2 where the treatment system was down for more than one hour.
11/13/2019	MACT (Part 63)	Compliance	Semiannual Compliance with Subparts A and AAAA and SSM Plan. During the reporting period, there were 27 startup, 7 shutdown and 17 malfunction events documented. The company indicated that all provisions of the SSM Plan were followed during the reporting period. SSM records are maintained on site and no changes were made to the plan.

Activity Date	Activity Type	Compliance Status	Comments
11/13/2019	ROP Semi 1 Cert	Compliance	The company reported two types of deviations. There were 5 wells (H02, EW23, EW45, EW460, W46A) that exhibited high oxygen that could not be resolved in 15 days. There were 2 wells (EW47 and EW46A) that had pressure exceedances that could not be resolved in 15 days. The company took corrective actions by repairing/replacing lateral lines and maintaining water pumps. Alternate timelines were ultimately approved by AQD. For EUENCLSDFLARE, there were 2 instances when the flow meter did not record data due to a time change and a power outage. The flare was operational during these times. No surface emission monitoring exceedances during the reporting period. Original signatures for the responsible official were provided.
11/13/2019	NSPS (Part 60)	Compliance	Semiannual Compliance for Subpart WWW. Semiannual Compliance for Subpart WWW. The company fulfilled its semiannual NSPS report responsibilities.
11/13/2019	MACT (Part 63)	Compliance	Semiannual Compliance with Subparts A and AAAA and SSM Plan. MI-ROP-N3294-2019. SSM Report (Subpart AAAA)- During the reporting period, there were 9 startup, 9 shutdown and 0 malfunction events documented. The company indicated that all provisions of the SSM Plan were followed during the reporting period. SSM records are maintained on site and no changes were made to the plan.
10/11/2019	NSPS (Part 60)	Compliance	Annual Liquids Addition Reporting

Name: David L. Ryan

Date: 9/30/2020

Supervisor: HH