DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

District :	
District :	Grand Rapids
County :	IONIA
	Non Compliance
aff: David	Morgan
•	8/22/2016
and a second	Reconciliant and a second s
	ipliance us :

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/27/2016	Scheduled Inspection	Non Compliance	
05/11/2016	MAERS	Compliance	It is noted that NMOC emissions estimates from LandGem were based on using a NMOC concentration of 595 ppmv as hexane, however, testing in 2015 determined that the site-specific NMOC concentration was 26.5 ppmv as hexane. Therefore,NMOC emissions from the landfill are likely overreported. - DLM
03/21/2016	ROP Annual Cert	Non Compliance	The submittal contained and original signature by the responsible official. Deviations were reported and previously certified.These deviations are considered noncompliance with the applicable requirements. However, USEPA is addressing noncompliance with these requirements through an Administrative Consent Order. Pitsch has fulfilled the requirements of the ACO.

.

Activity Date	Activity Type	Compliance Status	Comments
03/21/2016	ROP SEMI 2 CERT	Non Compliance	Deviations were noted for wells that had oxygen greater than 5%, flares not burning continuously, and startup/shutdown/malfunction events exceeding 1 hour. These deviations are considered noncompliance with the applicable requirements. However, USEPA is addressing noncompliance with these requirements through an Administrative Consent Order.Pitsch has fulfilled the requirements of the ACO.
03/21/2016	NSPS (Part 60)	Compliance	NSPS Semiannual report. The company has fulfilled its reporting requirements under 40 CFR Part 60, Subpart WWW by submitting a NSPS gas collection and control system report. See the semi- annual certification report for additional details.
03/21/2016	MACT (Part 63)	Compliance	Semiannual SSM report - The company has fulfilled its regulatory obligations under 40 CFR Part 63, Subpart AAAA by submitting the SSM report. There were 6 malfunctions and 6 shutdown events for maintenance. All SSM events were addressed in accordance with the SSM plan. All other provisions of the SSM Plan were followed therefore no deviations occurred.
11/13/2015	ROP Annual Cert	Non Compliance	The submittal contained and original signature by the responsible official. Deviations were reported and previously certified.These deviations are considered noncompliance with the applicable requirements. However, USEPA is addressing noncompliance with these requirements through an Administrative Consent Order.

Activity Date	Activity Type	Compliance Status	Comments
11/13/2015	ROP SEMI 2 CERT	Non Compliance	Because of a renewal ROP issued in 2014, two reports were received for 7/1/14 to 11/2014 and 11/21/14 to 12/31/14. Deviations were noted for wells that had oxygen greater than 5%, flares not burning continuously, and startup/shutdown/malfunction events exceeding 1 hour. These deviations are considered noncompliance with the applicable requirements. However, USEPA is addressing noncompliance with these requirements through an Administrative Consent Order.
11/13/2015	MACT (Part 63)	Compliance	Semiannual SSM report Because of a renewal ROP issued in 2014, two reports were received for 7/1/14 to 11/2014 and 11/21/14 to 12/31/14 The company has fulfilled its regulatory obligations under 40 CFR Part 63, Subpart AAAA by submitting the SSM report. There were 6 malfunctions and 7 shutdown events for maintenance. All SSM events were addressed in accordance with the SSM plan. All other provisions of the SSM Plan were followed therefore no deviations occurred.
11/13/2015	NSPS (Part 60)	Compliance	NSPS Semiannual report. Because of a renewal ROP issued in 2014, two reports were received for 7/1/14 to 11/2014 and 11/21/14 to 12/31/14. The company has fulfilled its reporting requirements under 40 CFR Part 60, Subpart WWW by submitting a NSPS gas collection and control system report. See the semi-annual certification report for additional details.

Activity Date	Activity Type	Compliance Status	Comments
11/13/2015	ROP Semi 1 Cert	Non Compliance	Deviations were noted for wells that had oxygen greater than 5%, flares not burning continuously, and startup/shutdown/malfunction events exceeding 1 hour. These deviations are considered noncompliance with the applicable requirements. However, a U.S.EPA Administrative Consent Order has been entered to address noncompliance of applicable requirements. The company has satisfied the sampling requirements of the Administrative Consent Order. NMOC emissions were determined to be 2.31 Megagrams through 2020.
11/13/2015	NSPS (Part 60)	Compliance	NSPS Semiannual report. The company has fulfilled its reporting requirements under 40 CFR Part 60, Subpart WWW by submitting a NSPS gas collection and control system report. See the semi- annual certification report for additional details.
11/13/2015	MACT (Part 63)	Compliance	Semiannual SSM report - The company has fulfilled its regulatory obligations under 40 CFR Part 63, Subpart AAAA by submitting the SSM report. There were 5 malfunctions and 5 shutdown events for maintenance. All SSM events were addressed in accordance with the SSM plan. All other provisions of the SSM Plan were followed therefore no deviations occurred.

Name: Date: 8/23/16 Supervisor:

Page 4 of 4