

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Venice Park RDF	SRN : N5910
Location : 9536 Lennon Rd.	District : Lansing
	County : SHIAWASSEE
City : LENNON State: MI Zip Code : 48449	Compliance Status : Compliance
Source Class : MAJOR	Staff : Matthew Karl
FCE Begin Date : 8/4/2021	FCE Completion Date : 3/13/2023
Comments : FCE for FY23. Source appears to be in compliance with the requirements of MI-ROP-N5910-2022.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/16/2023	Stack Test	Compliance	Stack Test Report associated with compliance testing of emission unit EUNANRENGINE7R.
02/14/2023	Stack Test Observation	Compliance	Stack test to determine visible emissions (VE), carbon dioxide (CO2), methane (CH4), nitrogen (N2) and oxygen (O2) concentrations and moisture content (% H2O) from open flare (EUOPENFLARE). To satisfy requirements to determine VE, net heating value and exit velocity from the flare.
02/14/2023	On-site Inspection	Compliance	On-site inspection conducted as part of a full compliance evaluation (FCE) to determine compliance with MI-ROP-N5910-2022.
01/25/2023	Stack Test Observation	Compliance	NANR Venice park LFG engine (CAT G3520C) EUNANRENGINE7R tested for 40 CFR Part 60, Subpart JJJJ NOx, CO, VOC emission rates.
01/11/2023	ROP Other	Compliance	Engine Change-out Notice. The replacement engine is identical (make & model) to the original engine & is equivalent-emitting. The engine change-out was of EUNANRENGINE10.

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01/03/2023	Reg. Applicability Determination	Compliance	Replacing Engine 10, switching unit serial number GZJ00539 to rebuilt/overhauled engine GZJ00626. Both the old engine and the replacement are Caterpillar G3520C units rated at 2242 bhp, 1600 kW at 100% load.
10/31/2022	ROP Semi 1 Cert	Compliance	Corrected SEMI report for ROP No. MI-ROP-N5910-2015a, Sec.2. Res. official, Thomas Burgett, VP-Midstream Services CO2-Kinder Morgan, NANR Venice Park Generating Station - Landfill Gas Treatment System 40 CFR 62 Subpart OOO / 40 CFR 63 Subpart AAAA. 2 downtime events and 1 that exceeded 1 hour for the treatment system. No exceedances of the treatment system operating parameters as established in the TSOP. No gas vented to atmosphere. No deviations.
09/28/2022	ROP Semi 1 Cert	Compliance	ROP No. MI-ROP-N5910-2015a, Sec.2. Res. official, Thomas Burgett, VP-Midstream Services CO2-Kinder Morgan, NANR Venice Park Generating Station - Landfill Gas Treatment System NSPS / NESHAP report. Corrected report requested as this counts as a non-submittal.
09/28/2022	ROP Semi 1 Cert	Compliance	1st SEMI 2022 cert and deviations report MI-ROP-N5910-2015a (MI-ROP-N5910-2022). 40 CFR 63, Subpart AAAA, 40 CFR 62, Subpart OOO, Sec.1; Res. official, John Gall, WM District Manager. Deviation reported for 3 times EUOPENFLARE when proof of flame and/or flow rate data was not recorded at least once every 15 minutes.
09/22/2022	ROP R215 Notification	Compliance	Change of Ownership: North American Natural Resources LLC (note: parent company is Kinder Morgan Inc.), Date of Transfer: August 11, 2022, RO change to Thomas Burgett (Vice President of Midstream Services CO2), New contact: Eric Parker (Environmental Manager).

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09/21/2022	MACT (Part 63)	Compliance	MI-ROP-N5910-2015a. 40 CFR 63, Subpart AAAA, 40 CFR 60, Incorrect reporting of Subpart XXX compliance since the facility is subject to the Federal Plan. Requested revision of the Landfill gas treatment system NSPS/NESHAP compliance report.
09/20/2022	MACT (Part 63)	Compliance	(electronic copy rec'd 9-14-22) NESHAP Semi-Annual 2022 report for 40 CFR 62, Subpart OOO. MI-ROP-N5910-2022.(hard copy rec'd 9-15-22). MI-ROP-N5910-2015a. 40 CFR 63, Subpart AAAA, 40 CFR 62, Subpart OOO, Sec.1; Res. official, John Gall, WM District Manager. EUACTIVECOLL - The wellhead pressure exceedances 41 times, and no wells with a temperature exceedance but no wellhead parameter exceedance for greater than 15-days. No control devices off-line for > than one (1) hour. EUOPENFLARE - 3 times flare flow data was not recorded every 15 minutes on 2/22/2022, 4/3/2022, and 5/12/2022. EULANDFILL - Seven locations exceeded 500 ppm, as methane, during the 1st quarter surface monitoring. Corrective action was not effective and the wellfield was expended by installing a new horizontal well (within 120 days). Three locations exceeded 500 ppm, as methane, during the 2nd quarter surface monitoring. Corrective action was effective at reducing surface emissions below the standard. No exceedances of site-specific criteria for the treatment system.
06/09/2022	Stack Test	Compliance	Electronic copy rec'd. Testing of emission units for EUNANENGINE8R and EUNANENGINE9 for MI-ROP-N5910-2015a and the SI-RICE NSPS; 40 CFR 60, Subpart JJJJ for CO, NOx, and VOC. Results indicate compliance with the emission limits while operating at near 100% load conditions for each engine. *Hard copy rec'd 6-9-22.

Activity Date	Activity Type	Compliance Status	Comments
05/16/2022	ROP Tech Review Notes	Compliance	ROP Renewal for No. MI-ROP-N5910-2015a
03/21/2022	ROP Annual Cert	Compliance	ROP No. MI-ROP-N5910-2015a. Sec.2; Res. official, Brian Evans, Chief Operating Officer; See ROP SEMI 1 & 2.
03/21/2022	MACT (Part 63)	Compliance	MI-ROP-N5910-2015a. Annual Compliance report for 40 CFR 63, Subpart ZZZZ. No deviations, information as specified in 40 CFR 63.6650(g)(1) - (3).
03/21/2022	ROP SEMI 2 CERT	Compliance	ROP No. MI-ROP-N5910-2015a, Sec.2. Res. official, Brian Evans, Chief Operating Officer, NANR Venice Park Generating Station - Landfill Gas Treatment System NSPS report. 40 CFR 60.752(b)(2)(iii)(C) & Startup, Shutdown and Malfunction (SSM) report for gas treatment system; 40 CFR 63, Subpart AAAA, 10 downtime events and 8 that exceeded 1 hour for the treatment system, and no gas vented to atmosphere. 7 manual shutdowns, 3 automatic shutdowns, and 10 startups all consistent with the SSM plan. No deviations.
03/21/2022	MAERS	Compliance	2021 MAERS. Need to Audit
03/10/2022	ROP Annual Cert	Compliance	ROP No. MI-ROP-N5910-2015a. Sec.1; Res. official, John Gall, WM District Manager. See ROP SEMI 1 & 2.
03/10/2022	MAERS	Compliance	2021 MAERS. Need to Audit

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03/10/2022	MACT (Part 63)	Compliance	<p>MI-ROP-N5910-2015a. 40 CFR 63, Subpart AAAA, 40 CFR 62, Subpart OOO. Semi-Annual MACT (9/27/2021 to 12/31/2021) and annual Federal Plan (7/1/2021 to 9/26/2021). 4 wells with temps greater than 131 degrees F between 7/1/2021 to 9/26/2021; and no wells with temps greater than 145 degrees F between 9/27/2021 to 12/31/2021. One instance when all control devices/collection system were offline on 10/1/2021 (1 hr 35 min) for scheduled utility outage. For surface emissions monitoring in the 3rd and 4th quarters, 21 locations exceeded 500-ppm, and corrective actions were effective in reducing surface emissions so no deviation of 63.1960(c). 7 replacement wells and 7 gas collectors decommissioned. All exceedances corrected within 60 days so no root cause analysis was submitted.</p>
03/10/2022	MACT (Part 63)	Compliance	<p>ROP No. MI-ROP-N5910-2015a Sec.1. Startup, Shutdown and Malfunction (SSM) report. No longer applicable on and after 9/27/2021. 40 CFR 63, Subpart AAAA. Res. official, John Gall, WM District Manager. 18 startup events, 18 shutdown events, and no (0) GCCS malfunction events. All actions taken for SSM events were consistent with the SSM Plan. No revisions made to SSM plan during this reporting period.</p>

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03/10/2022	ROP SEMI 2 CERT	Compliance	MI-ROP-N5910-2015a. 40 CFR 63, Subpart AAAA, 40 CFR 62, Subpart OOO and 40 CFR 60, Subpart WWW, Sec.1; Res. official, John Gall, WM District Manager. EUACTIVECOLL - 36 wells with O2 or pressure exceedance and 1 well with a temperature exceedance but no wellhead parameter exceedance for greater than 15-days. No control devices off-line for > than one (1) hour and no time during the reporting period when GCCS was not in operations in excess of 5 days. EUOPENFLARE - 2 times flare flow data was not recorded every 15 minutes on 7/2/2021 due to power lost and on 10/1/2021 due to scheduled utility outage. EULANDFILL - No locations that initially exceeded 500 ppm, as methane, during the 3rd and 4th quarter surface monitoring. 40 CFR 62.16720 - No times when control devices and/or the gas collection system was down for any duration. FGENGINES1-2 - No deviations.
01/31/2022	ROP Other	Compliance	Notification of a like-kind replacement of EUNANENGINE8R per the guidance in Policy & Procedure No. AQD-023. Like-kind replacement per Rule 285(2)(a)(vi) completed on 12/21/2021.
11/23/2021	Stack Test	Compliance	Test report of emission units EUNANENGINE8R and EUNANENGINE10 for MI-ROP-N5910-2015a and the SI-RICE NSPS; 40 CFR 60, Subpart JJJJ for CO, NOx, and VOC, and CHOH. Results indicate compliance with the emission limits while operating at near 100% load conditions for each engine. *hard copy rec'd 1-14-22*
10/25/2021	ROP R215 Notification	Compliance	Adding Brian Evans as a RO.

Activity Date	Activity Type	Compliance Status	Comments
10/18/2021	Other	Compliance	Engine change out (swap) of EUWMENGINE1 per Rule 285(2)(a)(vi) as part of routine maintenance. EUWMENGINE1 was scheduled to be replaced as part of WM's engine maintenance program. (CAT G3516, manufacture date: 9/2/1994, Serial No. 4EK00299). Replacement date scheduled: 10/18/2021.
09/29/2021	ROP R215 Notification	Compliance	Permit Change Notification Rule 215, regarding 40 CFR Part 63, Subpart AAAA Opt-In.
09/28/2021	Other	Compliance	Engine change out (swap) of EUNANRENGINE9 per Rule 285(2)(a)(vi) as part of routine maintenance. EUNANRENGINE9 was scheduled for major overhaul and purchased a new identical engine (CAT G3520C, manufacture date: 12/21/2015, GZJ00712). Replacement date: 9/10/2021.
09/28/2021	ROP Semi 1 Cert	Compliance	1st SEMI-Annual Report 2021 for ROP No. MI-ROP-N5910-2015a - Sec.2; 40 CFR 60, Subpart WWW; 40 CFR 63, Subpart AAAA. Res. official, Brian Evans, COO; NANR Venice Park Generating Station - Landfill Gas Treatment System NSPS report. 40 CFR 60.752(b)(2)(iii)(C) & Startup, Shutdown and Malfunction (SSM) report for gas treatment system; 40 CFR 63, Subpart AAAA (63.10(d)(5)), 2 downtime events and 2 that exceeded 1 hour for the treatment system, and no gas vented to atmosphere. 2 manual shutdowns, 0 automatic shutdowns, and 2 startups all consistent with the SSM plan. No deviations.
09/28/2021	Stack Test Observation	Compliance	Two (2) landfill gas-fired CAT 3520 engines (EUNANRENGINE8R and EUNANRENGINE10) were tested for carbon monoxide (CO), nitrogen oxides (NOx), non-methane volatile organic compounds (VOC) and formaldehyde (HCOH) per the requirements of ROP No. MI-ROP-N5910-2015a, and 40 CFR 60, Subpart JJJJ.

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09/15/2021	MACT (Part 63)	Compliance	<p>ROP No. MI-ROP-N5910-2015a Sec.1. Startup, Shutdown and Malfunction (SSM) report, 40 CFR 63, Subpart AAAA. Res. official, John Gall, WM District Manager. 21 startup events, 21 shutdown events, and one (1) GCCS malfunction event for a data recorder programming error on the flare. All actions taken for SSM events were consistent with the SSM Plan. No revisions made to SSM plan during this reporting period. *Hard copy received 9-17-21*</p>
09/15/2021	ROP Semi 1 Cert	Compliance	<p>1st SEMI-Annual Report 2021 for ROP No. MI-ROP-N5910-2015a - Sec.1; 40 CFR Part 62, Subpart OOO, 40 CFR 60, Subpart WWW; 40 CFR 63, Subpart AAAA. Res. official, John Gall, WM District Manager. EUACTIVECOLL - 29 wells with O2 or pressure exceedance and 1 well with a temperature exceedance but no wellhead parameter exceedance for greater than 15-days. No control devices off-line for > than one (1) hour and no time during the reporting period when GCCS was not in operations in excess of 5 days. EUOPENFLARE - 29 times flare flow data was not recorded every 15 minutes between 1/9/2021 to 2/25/2021 due to programming error. Other periods of missing data include power outages (2 events), re-programming the data recorder, and flare maintenance activity. EULANDFILL - No locations that initially exceeded 500 ppm, as methane, during the 1st and 2nd quarter surface monitoring. 40 CFR 62.16720 - No times when control devices and/or the gas collection system was down for any duration after June 21, 2021. FGENGINES1-2 - No deviations. *Hard copy received 9-17-21*</p>

Activity Date	Activity Type	Compliance Status	Comments
09/09/2021	Other	Compliance	Request for a Higher Operating Value (HOV) for Gas Wells VPL160R3, VPL161R3, VPL177R3, and VPL179R2 was received via email on 9/9/2021. An HOV of 150°F for wells VPL160R3, VPL161R3, VPL177R3, and VPL179R2, as allowed by 40 CFR 60.753(c) is approved. Gas wells VPL160R3, VPL161R3, VPL177R3, and VPL179R2 will be operated with a temperature at or below 150°F and an oxygen content of less than 3%. As proposed, if any of the gas wells have a measured temperature greater than 150°F and an oxygen content greater than 3%, the vacuum will be immediately reduced. The well will then be re-monitored within 15 days to determine if the temperature and oxygen concentration have been reduced. This monitoring will continue until either the temperature is below 150°F or the oxygen is below 3%.

Name: Matthew A. Hand

Date: 3/16/23

Supervisor: AB