

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : CARLETON FARMS LANDFILL	SRN : N5986
Location : 28800 CLARK RD	District : Detroit
	County : WAYNE
City : NEW BOSTON State: MI Zip Code : 48164	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Jonathan Lamb
FCE Begin Date : 9/25/2017	FCE Completion Date : 9/25/2018
Comments : FCE, FY 2018	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/25/2018	ROP SEMI 2 CERT	Compliance	2017 semi-annual 2 ROP Certification for time period July 1 - December 31, 2017. No deviations reported.
09/25/2018	ROP Annual Cert	Compliance	2017 Annual ROP Certification. No deviations reported.
09/24/2018	ROP Semi 1 Cert	Non Compliance	<p>1st 2018 semi-annual deviation report covering the time period January 1 through June 30, 2018. Facility reported one deviation:</p> <p>The facility reported seven instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Of note, the facility reported a period of 239 hours, 56 minutes from March 23 through April 2, 2018, during which time the utility flare failed to record flow rate once every 15 minutes due to loss of power.</p> <p>In reviewing this reported deviation, AQD has determined that the failure to monitor flow rate for over 239 hours to be excessive and in violation of 40 CFR 60, Subpart WWW and ROP No. MI-ROP-N5986-2015-Section 1.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2018	NSPS (Part 60)	Non Compliance	<p>Subpart WWW annual report, as required in 40 CFR 60.757(f). Facility submits reports on a annual and semi-annual basis combined with the ROP certification/deviation reports. The report contained the information required per 40 CFR 60.757(f)(1) through (f)(6). The facility reported no bypasses of the control system, no instances where the control to the wellfield were off for more than one hour, and no periods when the entire collection system was down for more than five days. Surface monitoring exceedances were corrected within NSPS guidelines.</p> <p>The facility reported seven instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Of note, the facility reported a period of 239 hours, 56 minutes from March 23 through April 2, 2018, during which time the utility flare failed to record flow rate once every 15 minutes due to loss of power. AQD has determined that the failure to monitor flow rate for over 239 hours to be excessive and in violation of 40 CFR 60, Subpart WWW.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2018	NSPS (Part 60)	Compliance	<p>Subpart WWW annual report, as required in 40 CFR 60.757(f). Facility submits reports on a annual and semi-annual basis combined with the ROP certification/deviation reports. The report contained the information required per 40 CFR 60.757(f)(1) through (f)(6). The facility reported no bypasses of the control system and no periods when the entire collection system was down for more than five days. One instance where there was no controls to the well field for one hour; appropriate actions were taken. Surface monitoring exceedances were corrected within NSPS guidelines.</p> <p>The facility reported 15 instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Most of these occurrences were due to maintenance or loss of power and were under two hours in duration; the longest occurrence was 8 hours, 10 minutes, due to a power outage of the utility flare.</p>
09/24/2018	ROP Semi 1 Cert	Compliance	1st 2018 semi-annual ROP Certification for time period January 1 - June 30, 2018. No deviations reported.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2018	MACT (Part 63)	Non Compliance	<p>2018 semi-annual Startup, Shutdown, and Malfunction (SSM) and Gas Collection and Control System (GCCS) Reports, as required per 40 CFR Part 63, Subpart AAAAA. Carleton Farms Landfill reported 42 startup, 45 shutdown, and 15 malfunction event during the reporting period January 1 - June 30, 2018. The malfunctions are summarized in Table 1 of the semi-annual SSM report. Of note, the facility reported 239.93 hours from March 23 through April 2, 2018, during which time the utility flare had a lost of power. AQD has determined that the failure to monitor flow rate for over 239 hours to be excessive and in violation of 40 CFR 63, Subpart AAAAA.</p> <p>For the other reported malfunctions, it appears corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period. GCCS Report contains information used to demonstrate proper operation of the GCCS, including surface monitoring, well monitoring, and flare operation data during the compliance period.</p>
08/06/2018	ROP Semi 1 Cert	Compliance	<p>1st 2017 semi-annual deviation report covering the time period January 1 through June 30, 2017. Facility reported two deviations:</p> <p>1) 15 occurrences where either the utility flare or enclosed flare failed to record the flow rate once every 15 minutes. Most of these occurrences were under two hours; the longest was 8 hours, 10 minutes on March 17, 2017.</p> <p>2) flare records not maintained for five years. This was previously reported and AQD had issued a violation notice. This violation is considered resolved.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/06/2018	ROP SEMI 2 CERT	Non Compliance	<p>2nd 2017 semi-annual deviation report covering the time period July 1 through December 31, 2017. Facility reported three deviations:</p> <p>1) five wells were unable to be monitored for temperature in Sept. 2017 due the well heads being elevated. The wells were monitored the following month and demonstrated compliance;</p> <p>2) facility failed to re-monitor Well 383 one month after initial exceedance; however, the well demonstrated compliance during the initial re-monitoring and the wellfield was expanded within 120 days.</p> <p>3) The facility reported four instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Of note, the facility reported 146 hours, 38 minutes from October 26 through November 1, 2017, during which time the utility flare failed to record flow rate once every 15 minutes due to loss of power.</p> <p>In reviewing these reported deviations, AQD has determined that the failure to monitor flow rate for over 146 hours to be excessive and in violation of 40 CFR 60, Subpart WWW and ROP No. MI-ROP-N5986-2015-Section 1.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/06/2018	ROP Annual Cert	Non Compliance	<p>2017 Annual ROP certification report. Four deviations reported, which have previously been reported in the semi-annual 1 and 2 ROP certification reports; for further information, please see the review of each semi-annual report.</p> <p>Status is determined to be non-compliance due to a failure to record flow rate of the utility flare once every 15 minutes for 146 hours, 38 minutes from October 26 through November 1, 2017, due to a loss of power. AQD has determined that the failure to monitor flow rate for over 146 hours to be excessive and in violation of 40 CFR 60, Subpart WWW and ROP No. MI-ROP-N5986-2015-Section 1.</p>
08/06/2018	MACT (Part 63)	Non Compliance	<p>Semi-annual Startup, Shutdown, and Malfunction (SSM) and Gas Collection and Control System (GCCS) Reports, as required per 40 CFR Part 63, Subpart AAAA. Carleton Farms Landfill reported 105 startup, 61 shutdown, and 42 malfunction event during the reporting period July 1 - December 31, 2017. The malfunctions are summarized in Table 1 of the semi-annual SSM report. Of note, the facility reported 146.63 hours starting on October 26, 2017, during which time the utility flare had a lost of power for "unknown" cause. AQD has determined that the failure to monitor flow rate for over 239 hours to be excessive and in violation of 40 CFR 63, Subpart AAAA.</p> <p>For the other reported malfunctions, it appears corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period. GCCS Report contains information used to demonstrate proper operation of the GCCS, including surface monitoring, well monitoring, and flare operation data during the compliance period.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/06/2018	NSPS (Part 60)	Non Compliance	<p>Subpart WWW annual report, as required in 40 CFR 60.757(f). Facility submits reports on a annual and semi-annual basis combined with the ROP certification/deviation reports. The report contained the information required per 40 CFR 60.757(f)(1) through (f)(6). The facility reported no bypasses of the control system and no periods when the entire collection system was down for more than five days. There were three occurrences where there were no controls for the well field for more than one hour; the longest duration was 3 hours, 14 minutes, and in all instances the gas mover system was shut down until controls could be started, as required. Surface monitoring exceedances were corrected within NSPS guidelines.</p> <p>The facility reported four instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Of note, the facility reported a period of 146 hours, 38 minutes from October 26 through November 1, 2017, during which time the utility flare failed to record flow rate once every 15 minutes due to loss of power. AQD has determined that the failure to monitor flow rate for over 239 hours to be excessive and in violation of 40 CFR 60, Subpart WWW.</p>
07/11/2018	ROP Other	Non Compliance	<p>Sumpter Energy Associates provided notification via email on June 15, 2018, that EUIENGINE_13 (CAT Model No. G3516) was replaced with an identical unit on May 8, 2018, due to high operating hours. Replacement engine has serial no. 4EK01299, build date of 4/8/1997, and horsepower rating of 1,138 hp.</p> <p>Notification was received late. Notification is required within 30 days of replacement, per Special Condition VII.4 under FGICENGINES9-14 in Section 2 of ROP-MI-N5986-2015.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/11/2018	ROP Other	Non Compliance	<p>Sumpter Energy Associates provided notification via email on June 15, 2018, that EUIENGINE_10 (CAT Model No. G3516) was replaced with an identical unit on March 20, 2018, due to high operating hours and engine being due for a major overhaul. Replacement engine has serial no. 4EK01546, build date of 10/6/1997, and horsepower rating of 1,138 hp.</p> <p>Notification was received late. Notification is required within 30 days of replacement, per Special Condition VII.4 under FGICENGINES9-14 in Section 2 of ROP-MI-N5986-2015.</p>
06/21/2018	Scheduled Inspection	Non Compliance	Targeted inspections of Carleton Farms Landfill and Sumpter Energy, FY 2018
05/21/2018	ROP Other	Compliance	2017 MAERS Report/ROP Certification Form Received
05/21/2018	ROP Other	Compliance	2017 MAERS ROP Report Certification Form Received
05/21/2018	Other	Compliance	2017 MAERS review

Activity Date	Activity Type	Compliance Status	Comments
02/20/2018	MACT (Part 63)	Compliance	Semi-annual Startup, Shutdown, and Malfunction (SSM) and Gas Collection and Control System (GCCS) Reports, as required per 40 CFR Part 63, Subpart AAAA. Carleton Farms Landfill reported 81 startup, 53 shutdown, and 62 malfunction events during the reporting period January 1 - June 30, 2017. The malfunctions are summarized in Table 1 of the semi-annual SSM report. Of note, the facility reported that Plant 1 and 2 were down for 49.5 hours from March 8-10, 2017, due to a power outage and the enclosed flare was also down for 12 hours on March 8, 2017. It appears the utility flare was in operation to control LFG during this time. The facility also reported that the flow meter to the enclosed flare was down for 93 hours starting February 28, 2017, due to a malfunction of the flow meter. It appears corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period. GCCS Report contains information used to demonstrate proper operation of the GCCS, including surface monitoring, well monitoring, and flare operation data during the compliance period.
01/31/2018	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart ZZZZ (RICE NESHAP) Annual Compliance Report for 2017, dated January 22, 2018, for Sumpter Energy at Carleton Farms Landfill (received January 26, 2018). Facility reported 100% heat input provided by LFG (total of 871,615 MMBtu) for Phase I and Phase II. No deviations from operating limits were reported during the compliance period.
10/18/2017	ROP Semi 1 Cert	Compliance	2017 semi-annual 1 ROP Certification for time period January 1 - June 30, 2017. No deviations reported.

Name: 

Date: 9-25-18

Supervisor: 