

N5986  
Manda  
FCE

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 : 8/19/2018	FCE Completion Date : 8/19/2019
Comments : FCE, FY '19	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/19/2019	Scheduled Inspection	Non Compliance	Scheduled inspection, FY 2019
08/02/2019	ROP Other	Compliance	On July 29, 2019, AQD received notification from Sumpter Energy Associates that EUCENGINE_7 (CAT Model No. G3516) was replaced with an identical unit on July 23, 2019, due to major maintenance. Replacement engine has serial no. 3RC00467, build date of 11/26/1991, and horsepower rating of 1,138 hp.
05/30/2019	Other	Compliance	2018 MAERS review
05/29/2019	MAERS	Compliance	5/29/2019 - Updated 2018 MAERS Report Received
05/20/2019	ROP Other	Compliance	On May 13, 2019, AQD received notification from Sumpter Energy Associates that EUCENGINE_14 (CAT Model No. G3516) was replaced with an identical unit on April 10, 2019. Per an email from Emily Zambuto of Aria Energy on May 20, 2019, the replacement was due to high operating hours. Replacement engine has serial no. 4EK03228, build date of 5/6/2001, and horsepower rating of 1,138 hp.  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.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	ROP Annual Cert	Compliance	2018 Annual ROP Compliance Certification Report for Section 2 (Sumpter Energy). No deviations were reported during the compliance period.
03/28/2019	ROP SEMI 2 CERT	Compliance	2018 Semi-Annual 2 ROP Compliance Certification Report for Section 2 (Sumpter Energy) for the compliance period July 1 through December 31, 2019. No deviations were reported during the compliance period.
03/28/2019	ROP SEMI 2 CERT	Non Compliance	<p>2018 Semi-Annual 2 ROP Compliance Certification Report for Section 1 (Carleton Farms Landfill) for the time period July 1 through December 31, 2018. Facility reported 1 deviation for four occurrences where either the Utility Flare or the Enclosed Flare did not record flow once every 15 minutes due to loss of power or maintenance; the longest event last 28 hours due to a loss of power.</p> <p>Note: Facility did not report numerous wells which were operating above 131 F without approved HOVs as deviations, stating that since the wellfield was expended within 120 days, the wells do not have to be reported as a deviation. AQD is currently evaluating this interpretation of the rule.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	MACT (Part 63)	Non Compliance	<p>2018 Semi-Annual 2 Startup, Shutdown, and Malfunction (SSM) Report and Gas Collection and Control System (GCCS) Report for Section 1 (Carleton Farms Landfill), as required per 40 CFR Part 63, Subparts A and AAAA. Carleton Farms Landfill reported 74 startup, 43 shutdown, and 23 malfunction events during the reporting period. The malfunctions are summarized in Table 1 of the semi-annual SSM report. Of note, on August 22, 2018, it was reported that Plants 1 and 2 were down for 33.6 hours and the Enclosed Flare was down for 26.23 hours; the Utility Flare appears to have been in operation during this time; however, the landfill has averaged a landfill gas flow rate of 3,700-3,800 cfm, which is greater than the Utility Flare's capacity of 2,000 cfm.</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.</p> <p>Facility reported four exceedances in the 3rd Quarter and one exceedance in the 4th Quarter above 500 ppm methane during the quarterly surface monitoring. These exceedances were resolved by expansion of the wellfield within 120 days of initial exceedance.</p>
03/28/2019	ROP Annual Cert	Non Compliance	<p>2018 Annual ROP Compliance Certification Report for Section 1 (Carleton Farms Landfill). Facility reported two deviations for multiple occurrences of failing to monitor flow rate of the Utility Flare and Enclosed Flare. These deviations were evaluated during the review of the Semi-Annual Reports.</p>
03/13/2019	ROP Other	Compliance	<p>2018 MAERS ROP Certification Report Form Received</p>
02/26/2019	ROP Other	Compliance	<p>2018 MAERS ROP Report Certification Form Received</p>

Activity Date	Activity Type	Compliance Status	Comments
02/20/2019	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart ZZZZ (RICE NESHAP) Annual Compliance Report for 2018, dated January 29, 2019, for Sumpter Energy at Carleton Farms Landfill (received February 6, 2019, by AQD-SEMI Office). Facility reported 100% heat input provided by LFG, with 1,149,341,000 scf burned in Phase I and 812,129,439 scf burned in Phase II. Average heat value of the LFG ranged from 455 to 537 Btu/scf. No deviations from operating limits or errors in fuel meters were reported during the compliance period.
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 for Section 1 (Carleton Farms Landfill) 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 63, Subpart AAAA 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 semi-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>
09/24/2018	ROP Semi 1 Cert	Compliance	1st 2018 semi-annual ROP Certification for Section 2 (Sumpter Energy) for time period January 1 - June 30, 2018. No deviations reported.

