

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Brent Run Landfill	SRN : N5987
Location : 8335 W. Vienna Rd	District : Lansing
	County : GENESEE
City : MONTROSE State: MI Zip Code : 48457	Compliance Status : Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 8/9/2016	FCE Completion Date : 9/19/2017
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/09/2017	Scheduled Inspection	Compliance	Scheduled, unannounced inspection of Granger Electric. Scheduled, announced inspection of Brent Run Landfill. Both activities are PCE's as part of an FCE.
03/29/2017	MACT (Part 63)	Compliance	Annual MACT Subpart ZZZZ report for EUENGINES 3-6. Engines 3, 4 and 6 averaged 550-575 scfm landfill gas; engine 5 averaged 200 scfm landfill gas at 53% methane. Only landfill gas is used, therefore a demonstration that at least 10% of the heat input is from landfill gas is not applicable. There were issues with the fuel flow meter - as continuous data was not recorded for 16 mins 11/3/16. Todd Davlin, Responsible Official.
03/29/2017	ROP Annual Cert	Compliance	Annual Compliance Certification for Brent Run Landfill (Section 1) for MI-ROP-N5987-2015. Certified by Responsible Official Tim Church. Submitted report that reviews all permit conditions and statements of compliance for each.
03/29/2017	ROP SEMI 2 CERT	Compliance	Semi-Annual Compliance Certification for Landfill (Section 1). No deviations reported for 7/1/2016 - 12/31/2016 reporting period. Tim Church, Responsible Official signed.

Activity Date	Activity Type	Compliance Status	Comments
03/29/2017	MAERS	Compliance	<p>MAERS certification for 1/1/2016-12/31/2016 received March 15, 2017, for MI-ROP-N5987-2015;electronic received 3/14/17. Certified by Responsible Official Tim Church. Cornerstone consultants refused to correct the emissions from the 3520C engines by using December 2016 stack test data. They were using 2015 stack test data, which I did not agree with using, and because of their refusal to cooperate, I calculated the emissions based on the 2016 stack test myself. Check MAERS for any review comments.</p>
03/29/2017	NSPS (Part 60)	Compliance	<p>Semi-annual report for the GCCS which includes EULANDFILL, EUACTIVECOLL, and EUTREATMENTSYS. EULANDFILL quarterly surface monitoring for methane (8/23/16 & 11/18/16) - there were no exceedances of the 500 ppm surface methane limit. GCCS EUACTIVECOLL: There were no instances of elevated temperature greater than 131F exceeding 15 days. Wells 87 and 89 had O2 levels>5% for more than 15 days. All O2 exceedances were corrected within the approved alternative operating timeline. Wells 76R, 83, 80R, and 81R showed non-negative pressures, not correctable within 15 days of detection. All corrections conducted within approved alternative operating timelines. EUTREATMENTSYS: 4 instances of control device (treatment system, closed, & open flare) downtime (for maintenance and power loss) that exceeded 1 hour, no gas stream diversions as they do not have a bypass line.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/29/2017	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5987-2015 Section 1 of ROP. 47 start-up, 4 shutdown, and 2 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Tim Church
03/28/2017	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction semi-annual report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5987-2015, Section 2 of ROP. 7 start-up, 7 shutdown, and 0 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Todd Davlin.
03/28/2017	ROP Annual Cert	Compliance	Annual Report Certification. Certified for MI-ROP-N5987-2015. Source certifies compliance with all terms and conditions, except for the 1 deviation reported in the 2nd semi-annual report. Certified by Responsible Official Todd Davlin.
03/28/2017	ROP SEMI 2 CERT	Compliance	Semi-Annual Compliance Certification for Electric Generation Plant (Section 2). Reported 1 deviation: Flow of landfill gas, kw output, and hours of operation to Engines 3-6 were not continuously recorded during 1 event, November 3, 2016 for 16 minutes. Cause was unknown. If this becomes a trend, Granger may be in violation of ROP requirements and/or further investigations should take place to address the issue, which I recommended to D. Zimmerman. Todd Davlin, Responsible Official
03/28/2017	MAERS	Compliance	MAERS certification for 1/1/2016-12/31/2017 received March 13, 2017 for MI-ROP-N5987-2015 Section 2; certified by Responsible Official Todd Davlin. Check MAERS for any review comments.

Activity Date	Activity Type	Compliance Status	Comments
02/08/2017	Stack Test	Compliance	Emissions testing per MI-ROP-N5987-2015. Testing December 8, 2016 on EUENGINE3 (NOx, CO, VOC) and EUENGINE6(NOx, CO, VOC, SO2, formaldehyde). Report from Derenzo & Associates indicates compliance for all pollutants tested for both NSPS and permit emission limits while operating under maximum routine operating conditions (within 10% of its maximum capacity). The stack test report Executive Summary process data are within the parameter ranges I recorded during the stack test as well.
12/19/2016	Malfunction Abatement Plan	Compliance	Submittal of updated Malfunction Abatement Plan to include the newest engine, EUENGINE6, and remove EUENGINE2. Updates include reference to MI-ROP-N5987-2015 and PTI 78-16
12/08/2016	Stack Test Observation	Compliance	Stack Test Protocol, per performance objectives, that need to be identified/recorded during the EUENGINE3 and EUENGINE6 Stack Test scheduled for December 8, 2016. Includes data collected during the stack test.
11/28/2016	NSPS (Part 60)	Compliance	Initial notification of EUENGINE6 parameters, as required under NSPS JJJJ and PTI No. 78-16: Caterpillar G3520C, manufactured 2008, Serial # GZJ00387, 1600 kW, 2233 hp, 86L, low NOx design, landfill gas-fueled.
11/28/2016	MACT (Part 63)	Compliance	Although the permit application was sufficient for notification of installation of EUENGINE6 for MACT Subpart ZZZZ, Granger Brent Run also submitted a MACT ZZZZ initial notification similar to the NSPS JJJJ initial notification.
10/13/2016	NSPS (Part 60)	Compliance	EUTREATMENTSYS SSM is now reported under section 2. There were 4 startup, 2 shutdown, and 2 malfunction events. The 2 shutdown events were associated with a power outage. Actions taken at the facility for these events were stated to have been in accordance with the SSM Plan.

Activity Date	Activity Type	Compliance Status	Comments
10/13/2016	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Certification for Electric Generation Plant (Section 2), including cert for SSM report. No deviations reported. Todd Davlin, Responsible Official, certified.
10/13/2016	NSPS (Part 60)	Compliance	Semi-annual report for the GCCS EUACTIVECOLL, EULANDFILL, EUTREATMENTSYS, and EUOPENFLARE and EUENCLOSEDFLARE. EULANDFILL quarterly surface monitoring for methane 2/24/16 and 6/15/16- no exceedances of 500 ppm limit for either quarter. GCCS EUACTIVECOLL: There were no instances of elevated temperature greater than 131F exceeding 15 days. Wells 81R, 47R, and 80R had O2 levels >5% for more than 15 days. All O2 exceedances were corrected within the requested alternative operating timeline, except Well 80R which has a timeline of 8/8/16, and should be documented in the 2nd semi-annual report. There were no instances where positive or neutral pressure was observed exceeding 15 days. EUOPENFLARE & EUENCLOSEDFLARE: Two periods of control device downtime exceeding 1 hour as the result of power loss; no gas stream diversions as they do not have a bypass line.
10/12/2016	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5987-2015 Section 1 of ROP. 56 start-up, 4 shutdown, and 4 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Tim Church
10/11/2016	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Certification for Landfill (Section 1). No deviations reported for 1/1/2016 - 6/30/16 reporting period. Tim Church, Responsible Official signed.

Name: M. Church Date: 9/19/17 Supervisor: B. M.

