

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Citizens Disposal, Inc.	SRN : N5991
Location : 2361 W. Grand Blanc Rd.	District : Lansing
	County : GENESEE
City : GRAND BLANC State: MI Zip Code : 48439	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Julie Brunner
FCE Begin Date : 12/20/2018	FCE Completion Date : 12/20/2019
Comments : Non compliance due to increase in sulfur content of the landfill gas resulting in violations of permit limits and Rule 201.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/18/2019	Other	Compliance	Request for an alternative timeline to address the oxygen concentration in excess of 5% in wells CITCW109A (109A) and CITCW42E (42E) was approved until June 30, 2020 to complete construction. The wells have exhibited high oxygen concentrations since December 7, 2019. Request dated December 18, 2019 is within the 15-day requirement.
11/21/2019	Scheduled Inspection	Non Compliance	Performed a scheduled inspection to determine compliance with ROP No. MI-ROP-N5991-2016 and as part of an FCE. Ongoing violation of Rule 201 due to increase in sulfur content of the landfill gas.
11/12/2019	Stack Test Observation	Compliance	Stack test for EU-ENGINE6 and EU-ENGINE7 per the requirements of ROP No. MI-ROP-N5991-2016 and 40 CFR 60, Subpart JJJJ
11/01/2019	Other	Compliance	A request dated 10/31/2019 to decommission well HC09 was approved. The well has exhibited greater than 5% oxygen since 10-17-2019. MM staff agreed. Request was made within 15 days of the exceedance being measured.

Activity Date	Activity Type	Compliance Status	Comments
10/09/2019	Other	Compliance	A request dated 10/9/2019 to decommission well CITZHC05 (HC05) was approved. After 6-months of monitoring with the well closed, there was no elevated concentrations of methane in the area.
10/02/2019	Other	Compliance	Request for an alternative timeline to address positive pressure (lateral line to well is compromised) in well CITCW42E (42E) was approved until November 30, 2019. The well has exhibited positive pressure since September 19, 2019. Request dated October 1, 2019 is within the 15-day requirement.
09/19/2019	ROP Semi 1 Cert	Compliance	Semi-Annual Deviation Report - ROP No. MI-ROP-N5991-2016. Tom Castle, Responsible Official for landfill, flares and collection system. (40 CFR 60, Subpart WWW, 40 CFR 63 Subpart AAAA), EUACTIVECOLL - summary of variance requests (8) submitted and approved for well head >5% O2 and/or positive pressure not corrected within 15 days. EUGROFFLARE and EUZINKFLARE - no instances of where flare flow was not recorded every 15 minutes due to power outages or electronic clitches. EULANDFILL - Three (3) locations that initially exceeded 500 ppm of methane. Exceedances resolved within 30 days. There was no time during the reporting period when electricity generation and back-up flares (controls) were not in operation for more than 1-hour.
09/19/2019	MACT (Part 63)	Compliance	Semi-Annual Start-up, Shutdown, and Malfunction (SSM) Report, ROP-N5991-2016, 40 CFR Part 63 Subparts A and AAAA. Resp. Official, Tom Castle. 56 start-ups, 56 shutdowns, and 5 malfunction events were reported. Five (5) malfunction events for the Grof Flare and none exceeded one (1) hour in duration.

Activity Date	Activity Type	Compliance Status	Comments
08/08/2019	Other	Compliance	Request for an alternative timeline to address positive pressure (lateral line to well is compromised) in well CITC158A (158A) was approved until August 30, 2019. The well has exhibited positive pressure since July 25, 2019. Request dated August 8, 2019 is within the 15-day requirement.
07/12/2019	Other	Compliance	Request for an alternative timeline to address the oxygen concentration in excess of 5% in well CITCW18C (18C) was approved until August 15, 2019. The well had exhibited an oxygen exceedance since June 27, 2019. Request dated July 10, 2019 is within the 15-day requirement.
06/27/2019	Other	Compliance	Request for an alternative timeline to address positive pressure (vacuum line is damaged) in wells CITCW96C (96C) and CICW100C (100C) was approved until July 30, 2019. The wells have exhibited positive pressure since June 12, 2019. Request dated June 26, 2019 is within the 15-day requirement.
06/17/2019	Other	Compliance	The alternative timeline request for a higher operating value (HOV) of 140 degrees F for well CITCW158A (158A) was approved. Expect that drawing on the well which was just redrilled will bring down the temperature. Request dated June 14, 2019 is within the 15-day requirement.
05/24/2019	Other	Compliance	Request for an alternative timeline to address the excess oxygen in wells CITZW003 (W003) and CITZW016 (W016) was approved until July 30, 2019. The wells have exhibited excess oxygen since 5/10/2019 and are located in the old part of the landfill. Rebalancing the well field is going to be attempted to solve the issue. Request dated May 24, 2019 is within the 15-day requirement.

Activity Date	Activity Type	Compliance Status	Comments
05/22/2019	Other	Compliance	Request for an alternative timeline to install a new lateral line to well CITCW158A (158A) was approved until June 10, 2019. The well has exhibited positive pressure since 5/6/2019. Request dated May 21, 2019 is within the 15-day requirement.
05/15/2019	MAERS	Compliance	*Electronic* 2018 MAERS, resubmittal. ROP cert: Dan Zimmerman, Audited 5/17/19
04/01/2019	MAERS	Compliance	*Electronic* 2018 MAERS, check MAERS for any review comments. ROP cert: Richard Rolf (General Manager), signed: 3-7-2019: Resubmitted on 3-28-2019 to update RO. - Audited 5/15/19
04/01/2019	MACT (Part 63)	Compliance	Semi-Annual Start-up, Shutdown, and Malfunction (SSM) Report, ROP-N5991-2016, 40 CFR Part 63 Subparts A and AAAA. Resp. Official, Richard Rolf. 69 start-ups, 49 shutdowns, and 21 malfunction events were reported. Five (5) malfunction events exceeded one (1) hour in duration with the longest being 169 hours for the Zink Flare.
04/01/2019	ROP SEMI 2 CERT	Compliance	2nd Semi-Annual Deviation Report - ROP No. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 60, Subpart WWW), EUACTIVECOLL - summary of variance requests submitted and approved for well head >5% O2 and/or positive pressure not corrected within 15 days. EUGROFFLARE and EUZINKFLARE - Six (6) instances of where flare flow not recorded every 15 minutes due to power outages or electronic clitches. EULANDFILL - Fifteen (15) locations that initially exceeded 500 ppm of methane. Exceedances resolved within 30 days. There was no time during the reporting period when electricity generation and back-up flares (controls) were not in operation for more than 1-hour.
04/01/2019	ROP Annual Cert	Compliance	ROP No. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for Landfill, flares and collection system.

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04/01/2019	ROP Annual Cert	Non Compliance	ROP No. MI-ROP-N5991-2016, Responsible Official - Dan Zimmerman, Dir N.A. HSE & Compliance. Corrected paperwork still not received for change in RO. Ongoing violation due to change in sulfur content of the gas.
04/01/2019	ROP SEMI 2 CERT	Non Compliance	Semi-Annual Deviation Report, ROP No. MI-ROP-N5991-2016, Section 2. Responsible Official - Dan Zimmerman, Dir N.A. HSE & Compliance. EDL Electric Plant. Includes landfill gas treatment system report and landfill gas engines report. LFG was not diverted through a bypass line and there were no periods when treatment system was down for more than 1-hour. Landfill gas to the engines, and kilowatt output from each engine was continuously monitored and recorded. FG ENGINES are operating in compliance with the emission standards in Subpart JJJJ and still out of compliance with the SOx limit.
04/01/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart ZZZZ annual report ROP No. MI-ROP-N5991-2016, Section 2. Responsible Official - Dan Zimmerman, Dir N.A. HSE & Compliance. Seven (7) engines were operated in accordance with the conditions of the ROP and no issues were encountered in operating the fuel flow meters.
04/01/2019	MACT (Part 63)	Compliance	ROP No. MI-ROP-N5991-2016, Responsible Official - Dan Zimmerman, Dir N.A. HSE & Compliance. EDL Plant. Startup, shutdown, malfunction report - 40 CFR 63, Subpart AAAA. 12 startup, 12 shutdown, and no malfunction events.

Activity Date	Activity Type	Compliance Status	Comments
03/11/2019	Other	Compliance	Request for an alternative operating scenario to close/shutdown well CITZHC05 (HC05) for 6-months is approved as long as the alternate standard operating procedure for nonproductive wells at a facility is equivalent to the procedures described in ADI Control No. 0600062. The well has exhibited an oxygen concentration above 5% since 2/14/2019. Request dated March 1, 2019 within the 15-day requirement.
03/05/2019	Other	Compliance	Request for an alternative timeline to install a new lateral line to well CITCW157 (157) was approved until May 31, 2019. The well has exhibited positive pressure since 2/14/2019. Request dated March 1, 2019 is within the 15-day requirement.
02/28/2019	Other	Compliance	Request for an alternative timeline to install a new lateral line to well CICW22R2 (22R2) was approved until May 31, 2019. The well has exhibited positive pressure since 2/13/2019. Request dated February 28, 2019 within the 15-day requirement.
02/08/2019	Other	Compliance	Request for an alternative timeline to install a new lateral line to well CITCW42E (W42E) was approved until May 31, 2019. The well has exhibited positive pressure since 1/24/2019 and the lateral is pinched. Request dated February 8, 2019 within the 15-day requirement.
01/29/2019	MAERS	Compliance	Electronic - 2018 MAERS, Check MAERS for any review comments
01/17/2019	MAERS	Compliance	2018 MAERS, check MAERS for any review comments

Activity Date	Activity Type	Compliance Status	Comments
01/16/2019	Stack Test	Non Compliance	Stack test report for performance testing of EGL (former Granger) landfill gas fueled engines EUENGINE6 and EUENGINE7 as required by ROP No. MI-ROP-N5991-2016 and 40 CFR Part 60 Subpart JJJJ. Chris Ashdown, Responsible Official. Testing was performed November 28, 2018. Pollutants tested were NOx, CO, SO2, and VOC . The test report indicates that the results are in compliance for NOx, CO, and VOC, and that emission limits for SO2 were exceeded.

Name: Julie P. Brown Date: 12/20/19 Supervisor: 

