

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 : Matthew Karl
FCE Begin Date : 6/22/2022	FCE Completion Date : 6/6/2024
Comments : Full Compliance Evaluation (FCE) of MI-ROP-N5991-2016 for Fiscal Year (FY) 2024.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/14/2024	Annual Emissions Report (or MAERS)	Compliance	Annual Emission Report. CO 269.17 TPY, NMOC 13.18 TPY, NOx 118.52 TPY, PM10-PRI 36.33 TPY, PM10-FIL 20.66 TPY, PM2.5-PRI 16.01 TPY, PM2.5-FIL 0.34 TPY, SO2 158.15 TPY, VOC 72.32 TPY, HAPs-PAH 0.022.
05/13/2024	On-site Inspection	Non Compliance	On-site inspection as part of a full compliance evaluation (FCE) to determine compliance with permit MI-ROP-N5991-2016. This on-site inspection was scheduled at the same time as a SEM survey audit of the landfill. The facility still has an outstanding compliance issue with their SO2 emissions, they currently have permit applications in with the permit section to address this issue.
04/17/2024	ROP R215 Notification	Compliance	Notification of Change for inclusion of one standard cubic feet per minute passive vent flare (EUSOLARFLARE) into the existing ROP (MI-ROP-N5991-2016 section 2.

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03/25/2024	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart AAAA. 40 CFR 63 (Treatment System) Report. Section 2. EUTREATMENTSYS SC III.2. Treated landfill gas was vented to the atmosphere between the treatment system and the engines. This occurred on eight (8) occasions lasting approximately 5 minutes each. These events were due to residual amounts of high oxygen remaining in the treated LFG within the pipe between the treatment system and engines after treatment system shutdowns due to high oxygen levels within the LFG. This issue was resolved with the installation of a 140 SCFM solar flare on December 26, 2023 to control the high oxygen gas events.
03/25/2024	ROP Annual Cert	Non Compliance	ROP Annual Compliance Certification Section 2. Two (2) deviations were noted, and both deviations persisted in both semiannual period 1 and period 2 (4 total). FGENGINE SC I.2 Engines 6 & 7 were not in continuous compliance with the hourly SO2 emission limit of 1.7 lb/hr. EUTREATMENTSYS SC III.2 Treated landfill gas was vented to the atmosphere between the treatment system and the engines. This issue was resolved on December 26, 2023 with the installation of a 140 SCFM solar flare.
03/25/2024	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart ZZZZ Annual Report for ROP No. MI-ROP-N5991-2016. Section 2. No deviations reported.
03/25/2024	ROP SEMI 2 CERT	Non Compliance	ROP 2nd Semiannual Compliance Report. Section 2. Two (2) deviations were reported. FGENGINE SC I.2 Engines 6 & 7 were not in continuous compliance with the hourly SO2 emission limit of 1.7 lb/hr. EUTREATMENTSYS SC III.2 Treated landfill gas was vented to the atmosphere between the treatment system and the engines. This issue was resolved on December 26, 2023 with the installation of a 140 SCFM solar flare.

Activity Date	Activity Type	Compliance Status	Comments
03/11/2024	ROP Annual Cert	Compliance	<p>ROP Annual Compliance Certification Section 1.</p> <p>EULANDFILL SC VI.5 SEM Q1 one (1) location initially exceeded 500ppm CH4, Q2 nine (9) exceeded 500 ppm CH4. Re-monitoring results indicate corrective action was effective in all but one location P1 (primary sump riser). Submitted alternative remedy and timeline request (ATR) on July 28, 2023 with alternative timeline to August 31, 2023 to connect sump riser to GCCS. Q3 eight (8) locations initially exceeded the 500ppm CH4 standard, and in Q4 five (5) locations initially exceeded the 500ppm CH4 standard. Re-monitoring indicated that corrective action was effective at reducing emissions below the standard. EUZINKFLARE SC VI.3 & VI.4. Eight (8) occurrences where records were not kept for temperature and flow at least once every 15 minutes. Three (3) were caused by maintenance, four (4) were caused by flow meter malfunction and maintenance and one (1) was caused by a power outage.</p>
03/11/2024	ROP SEMI 2 CERT	Compliance	<p>ROP Semiannual 2 Compliance Certification Section 1.</p> <p>EUZINKFLARE SC VI.3 & VI.4. Three (3) deviations noted where flare temperature and flow were not recorded at least once every 15 minutes. Two (2) occurrences were due to flow meter maintenance, and one (1) occurrence was due to maintenance.</p>

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03/11/2024	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart AAAA Semiannual Report Section 1. The 500 ppm CH ₄ standard was exceeded eight (8) times in Q3 and five (5) times in Q4. Re-testing showed that corrective actions brought the CH ₄ emissions below the standard. Wellhead pressure standard was exceeded 42 times. No replacement or new landfill gas wells were installed or decommissioned. No exceedances took longer than 15 days to correct. No wells were subject to enhanced monitoring.
03/11/2024	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart AAAA. Section 1. 40 CFR 63.1981(j)(1) Gas well 157A has exhibited positive wellhead pressure since December 29, 2023. Corrective action was initiated within 5 days of the initial occurrence, but still exhibited an exceedance beyond 60 days for pressure. The site investigated the cause and found that the lateral line that supplies vacuum to the well has been compromised. The site plans to install a new lateral line to restore vacuum to the well. Construction drawing for the project have been completed and bids to complete the proposed construction have been awarded. Work is scheduled to begin the week of April 15, 2024 and be completed by April 27, 2024. Therefore, this corrective action will take longer than 60 days, but less than 120 days pursuant to 40 CFR 63.1960(a)(3)(i)(B). Applicable information regarding these corrective actions will be reported pursuant to 40 CFR 63.1981(h).
03/05/2024	ROP R215 Notification	Compliance	Energy Developments Grand Blanc LLC (Section 2) Rule 215(5) Notification of change of responsible official to Raymond Ivers, President, Operations. (508)-243-9362.

Activity Date	Activity Type	Compliance Status	Comments
12/04/2023	Stack Test	Compliance	EDL Grand Blanc Test Report for EUENGINE6 and EUENGINE7 (FGENGINES). EUENGINE6: CO 12.3 lb/hr, 2.46 g/bhp-hr; NOx 2.02 lb/hr, 0.40 g/bhp-hr; VOC 0.69 lb/hr; 0.14 g/bhp-hr. EUENGINE7: CO 13.7 lb/hr, 2.72 g/bhp-hr; NOx 1.58 lb/hr, 0.32 g/bhp-hr; VOC 0.87 lb/hr; 0.17 g/bhp-hr.
11/20/2023	ROP Semi 1 Cert	Non Compliance	<p>During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report.</p> <p>FGENGINES SC I.2 Engines (EUENGINE6 & EUENGINE7) were not in continuous compliance with the hourly SO2 emission limit of 1.7 lb/hr. The increase in SO2 emission is a result of changed TRS concentrations in the landfill gas combusted in the facility engines, which is dependent on the type of waste the landfill accepts and can vary.</p> <p>EUTREATMENTSYS SC III.2 On six (6) occasions, January 30, February 20, April 5 and 13, June 15 and 20, 2023, for periods estimated to be no more than five (5) minutes each, treated landfill gas was vented to the atmosphere between the treatment system and the engines. These events were due to residual amounts of high oxygen remaining in the treated LFG within the pipe between the treatment system and engines after treatment system shutdowns due to high oxygen levels within the LFG. Following discovery, EDGB contracted a consultant to evaluate the facility and design a modification for the LFG treatment system to ensure treated LFG that cannot be routed for subsequent sale or beneficial use is routed to a control device.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/20/2023	MACT (Part 63)	Non Compliance	<p>1st 2023 40 CFR 63 Subpart AAAA (Treatment System) Report. During the reporting period, EDGB discovered treated LFG was temporarily diverted to the atmosphere after being processed through the treatment system but prior to combustion in the engines using a release valve on six (6) occasions, January 30, February 20, April 5 and 13, June 15 and 20, 2023. It is estimated that each event lasted no more than five (5) minutes. The release of the treated LFG during these events was not controlled in accordance with the applicable regulatory requirements or ROP condition. These events were due to residual amounts of high oxygen remaining in the treated LFG within the pipe between the treatment system and engines after treatment system shutdowns due to high oxygen levels within the LFG. Following discovery, EDGB contracted a consultant to evaluate the facility and design a modification for the LFG treatment system to ensure treated LFG that cannot be routed for subsequent sale or beneficial use is routed to a control device.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/18/2023	MACT (Part 63)	Compliance	1st 2023 40 CFR Part 63 Subpart AAAA NESHAP Report for ROP No. MI-ROP-N5991-2016. (hard copy rec'd 9-15-23). Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), EULANDFILL - There was 1 location and 9 locations that initially exceeded 500 ppm of methane in the 1st and 2nd quarter scans. All cleared by 30-day with the exception of location of P1. The facility submitted an alternative remedy and timeline request (ATR) on 7/28/2023 and requested an alternative timeline to 8/31/ 2023 to connect the sump riser to the existing GCCS system and place the location under vacuum to control landfill gas migration. Request approved on 7/28/2023. Wellfield Expansion - 4 replacement or new landfill gas wells were installed and 2 landfill gas wells decommissioned. 5 exceedances of temperature and/or pressure took longer than 15 days to correct, 2 were corrected within 60 days requiring root cause analyses. Collection system & treatment system shutdown/startup/downtime report with the longest of 5.8 hrs (wellfield maintenance).
09/18/2023	ROP Semi 1 Cert	Compliance	1st 2023 Semi-annual report for ROP No. MI-ROP-N5991-2016. (hard copy rec'd 9-15-23). Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), No deviations for EULANDFILL, EUASBESTOS, EUACTIVECOLL. EUGROFFLARE - no instances of where gas flow data and temperature was not recorded every 15 minutes. EUZINKFLARE - 5 instances where flow data and temperature data were not recorded every 15 minutes due to maintenance and/or malfunction.

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07/28/2023	Other	Compliance	The request for an alternative remedy to correct an exceedance in surface methane emissions in a location corresponding to a surface penetration (i.e., a primary sump riser) was approved. To correct the exceedance, the facility plans to connect the sump to the landfill gas collection system and place the sump riser under vacuum to collect any landfill gas present in the sump. This work is expected to be completed by August 31, 2023. The alternative remedy is in accordance with 40 CFR 63.1960 (c)(4)(v).
05/31/2023	Other Non ROP	Compliance	Corrective Action Notification - Submitted notification in accordance with 40 CFR 62.16724(k)(2) that corrective action was initiated within 5 days of the initial occurrence, but still exhibited an exceedance beyond 60 days for pressure. Gas wells 109A and HC15 showing positive wellhead pressure since 3/15/2023. Camera investigation shows that the lateral line to these wells appears to be pinched. The site's action plan is to install a new lateral line to restore vacuum. The new lateral should be completed before the end of June. Therefore, this corrective action will require more than 60 days but is not expected to take longer than 120 days to be completed after the initial monitoring exceedance pursuant to 40 CFR 62.16720(a)(3)(ii). As such, applicable information regarding these corrective actions will be reported pursuant to 40 CFR 62.16724(h).

Activity Date	Activity Type	Compliance Status	Comments
03/24/2023	ROP SEMI 2 CERT	Compliance	2nd 2022 Semi-annual and Deviation report for ROP No. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), No deviations for EUACTIVECOLL. EUGROFFLARE - no instances of where gas flow data and temperature was not recorded every 15 minutes. EUZINKFLARE - 2 instances where flow data was not recorded every 15 minutes and where temperature data was not recorded every 15 minutes due to maintenance. Failure to perform monthly pressure, oxygen, and temperature monitoring at CITC102 in December.
03/24/2023	ROP Annual Cert	Compliance	Annual ROP Report - Part 63, Subpart AAAA/Federal Plan, Subpart OOO (effective 6/21/2021) - ROP No. MI-ROP-N5991-2016. RO - Richard Rolf. See semi 1 and 2.
03/24/2023	MACT (Part 63)	Compliance	2nd 40 CFR Part 63 Subpart AAAA Semi-Annual Report for ROP No. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), EULANDFILL - There were 6 locations that initially exceeded 500 ppm of methane in the 3rd and 4th quarter scans (all cleared by 30-day). Wellfield Expansion - No replacement and no new landfill gas wells were installed. 3 exceedances of temperature and/or pressure took longer than 15 days to correct, but were corrected within 60 days. Collection system & treatment system downtime report and 20 shutdowns reported with the longest of 22.33 hrs (CK4 watered in).
03/24/2023	Annual Emissions Report (or MAERS)	Compliance	MAERS cert. Audit. Source Totals: CO 284.83 TPY, NMOC 13.17 TPY, NOx 122.80 TPY, PM10,FLTRBLE 35.30 TPY, PM10,PRIMARY 0.05 TPY, PM2.5,PRIMARY 0.05 TPY, SO2 95.00 TPY, VOC 62.09 TPY.

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03/20/2023	ROP Annual Cert	Non Compliance	ROP No. MI-ROP-N5991-2016. Annual Compliance Cert. ROP No. MI-ROP-N5991-2016, Section 2. Responsible Official - Rocky Tondo, Head of Project Delivery and Tech Services. On-going violation of hourly SOx emission limit for EUENGINE6 & 7. See Semi 1 & 2. Corrected cert resubmitted (received 3/27/2023) checking box no.2 denoting deviations.
03/20/2023	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart ZZZZ Annual Report for ROP No. MI-ROP-N5991-2016. EDGB engines use only landfill gas for electricity generation. No other fuel source is used to generate electricity in these engines. The engines were operated in accordance with the operating limits provided in the permit and no issues were encountered in operating the fuel flow meters.
03/20/2023	ROP SEMI 2 CERT	Non Compliance	2nd SEMI ROP No. MI-ROP-N5991-2016. EDL Plant. 40 CFR 62, Subpart OOO, & 40 CFR 63, Subpart AAAA. Responsible Official - Rocky Tondo. (Corrected cert resubmitted (received 3/27/2023) checking box no.2 denoting deviations.) Deviations include on-going non-compliance with SO2 emission limit on EUENGINE6 & 7; EUTREATMENTSYS - 26 times the treatment system was down, the longest which was 23.6 hours for plant shutdown landfill and 23 times the treatment system was down for longer than 1 hour. No venting of gas.
03/15/2023	Annual Emissions Report (or MAERS)	Compliance	2022 MAERS received electronically.
12/07/2022	Stack Test	Compliance	Stack test report for performance testing of 2 landfill gas fueled engines. EUENGINE6 and EUENGINE7 as required by ROP No. MI-ROP-N5991-2016 and 40 CFR Part 60 Subpart JJJJ. Rocky Tondo, Responsible Official. Pollutants tested were NOx, CO, and VOC. The test report indicates that the results are in compliance for NOx, CO, and VOC.

Activity Date	Activity Type	Compliance Status	Comments
11/03/2022	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
09/19/2022	MACT (Part 63)	Compliance	1st 2022 40 CFR Part 63 Subpart AAAA NESHAP Report for ROP No. MI-ROP-N5991-2016. EDL Plant. 40 CFR 62, Subpart OOO & 40 CFR 63, Subpart AAAA. Responsible Official - Rocky Tondo. EUTREATMENTSYS - 15 times the treatment system was down the longest which was 5.83 hrs (plant shutdown due to landfill) including 7 times the treatment system was down for longer than 1 hour. No venting of gas. Treatment system monitoring plan report - 5 exceedances where process temperature within plan parameters with corrective actions taken.
09/19/2022	ROP Semi 1 Cert	Non Compliance	1st 2022 Semi-annual and Treatment System report for ROP No. MI-ROP-N5991-2016. EDL Plant. 40 CFR 62, Subpart OOO, & 40 CFR 63, Subpart AAAA. Responsible Official - Rocky Tondo. On-going non-compliance with SO2 emission limit on EUENGINE6 & 7.
09/15/2022	ROP Semi 1 Cert	Compliance	1st 2022 Semi-annual and Deviation report for ROP No. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), No deviations for EUACTIVECOLL. EUGROFFLARE and EUZINKFLARE - 5 instances of where flare flow was not recorded every 15 minutes due to malfunction or maintenance.

Activity Date	Activity Type	Compliance Status	Comments
09/15/2022	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart AAAA Semi-Annual Report for ROP No. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), EULANDFILL - There were 7 locations that initially exceeded 500 ppm of methane in the 1st and 2nd quarter scans (all cleared by 30-day). Wellfield Expansion - Five (5) replacement and two (2) new landfill gas wells were installed, and five (5) gas collectors were decommissioned during the reporting period. All exceedances of temperature (none) & pressure (16 times) corrected within 15 days. Collection system & treatment system downtime, 12 shutdowns reported with the longest of 5.67 hrs (shutdown for construction).
06/22/2022	On-site 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.

Name:

Matthew R. Kail

Date:

6/6/24

Supervisor:

HB