

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Oakland Heights Development, Inc.	<b>SRN :</b> N6008
<b>Location :</b> 2350 Brown Road	<b>District :</b> Warren
	<b>County :</b> OAKLAND
<b>City :</b> AUBURN HILLS <b>State:</b> MI <b>Zip Code :</b> 48326	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Robert Joseph
<b>FCE Begin Date :</b> 9/1/2021	<b>FCE Completion Date :</b> 1/19/2023
<b>Comments :</b> Scheduled inspection of the landfill facility owned by Republic Services and the gas pipeline managed by WMRE.	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
12/13/2022	On-site Inspection	Compliance	Scheduled inspection of municipal landfill
10/05/2022	ROP Semi 1 Cert	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Semi-Annual report from 01/01/22 to 06/30/22.</p> <p>TREATMENT SYSTEM: The facility states there were no exceedances of site-specific for the treatment system parameters.</p> <p>CONTROL DEVICE DOWNTIME: There were 4 instances during this reporting period when all control devices were shut down for more than one hour relating to maintenance between 1 hr to 7 hrs, and blower electrical overload at 1.25 hrs. These instances were due to activity at Oakland Heights Landfill.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/04/2022	ROP Semi 1 Cert	Compliance	<p>Oakland Heights Development-Section 1</p> <p>Semi-Annual Report for Time Period Jan. 1, 2022 - June 30, 2022.</p> <p>EUALGCS: The facility did not report any occurrences.</p> <p>EUFLARE: There was 1 instance when the flowmeter did not record data for more than 15 minutes ranging on May 26, 2022, for 1 hr 39 min. due to maintenance.</p> <p>EULANDFILL: The facility did not report any occurrences.</p> <p>EUASBESTOS and EUCOLDCLEANERS: The facility did not report any occurrences.</p>

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10/04/2022	MACT (Part 63)	Compliance	<p>Oakland Heights Development - NESHAP AAAA report January 1 through June 30, 2022.</p> <p>Per Subpart AAAA, 40 CFR 63.1981:</p> <p>REPORTING: The facility does not operate an enclosed flare, they operate an open flare.</p> <p>MONITORING/EXCEEDANCES: The facility states that 21 wellhead pressure exceedances occurred, and 0 temperature exceedances. All were corrected within 60-days except for 2 wells which the facility provided notification. Both were corrected under 120-days. No enhanced monitoring occurred.</p> <p>The facility reports there were 6 surface scan emissions exceeded 500-ppm during this period. 3 occurrences occurred in each of the 1st (March 1, 2022) and 2nd quarter scans (May 5, 2022). The facility states the exceedances were corrected upon re-monitoring. There were no occurrences when the GCCS vented to the atmosphere for more than 1 hour, and treatment system exceedances.</p> <p>DIVERSION OF GAS: There is no bypass within the GCCS.</p> <p>COLLECTION SYSTEM and CONTROL DEVICE DOWNTIME: There were 3 occurrences relating to maintenance between 1 hr to 7 hrs, and blower electrical overload at 1.25 hrs.</p> <p>SYSTEM EXPANSION: 3 gas wells (as well as additional equipment) were installed during this reporting period and 3 gas wells were decommissioned (61A, 118A, 119A). The facility replaced the decommissioned wells with replacement wells (61B, 118B, 119B).</p>

Activity Date	Activity Type	Compliance Status	Comments
10/03/2022	MACT (Part 63)	Compliance	Facility provided notification that corrective action for gas well 81B (pressure) will exceed 60-days but less than 120-days given that installation of the new lateral line should be completed the week of September 26, 2022 (under 120-days since initial exceedance).
07/07/2022	MACT (Part 63)	Compliance	Facility provided notification that corrective action for gas well 118B (pressure) will exceed 60-days but less than 120-days given that installation of the new lateral line should be complete before then.
06/10/2022	MACT (Part 63)	Compliance	Facility provided notification that corrective action for gas well 107A will exceed 60-days but less than 120-days given that installation of the new lateral line should be complete before then.
05/31/2022	ROP SEMI 2 CERT	Compliance	<p>Semi-Annual Report per 40 CFR part 63 Subpart AAAA (NESHAP) for time period 09/27/21 to 12/31/21.</p> <p>Active Collection: There were 4 wells that exceeded the pressure limitation and none for temperature. There were no instances when the entire collection system was not in operation in excess of 5 days, and no instances when the gas collection and control system vented to the atmosphere for more than 1 hour. There were (8) landfill gas wells installed during this reporting period and (8) decommissioned.</p> <p>Open Flare: There was (1) instance where the flare was down. It was down for 21 minutes due to an emergency stop button error.</p> <p>Landfill: There were 3 locations that initially exceeded 500 ppm during the 3rd quarter scan. There were 14 locations that exceeded 500 ppm during the 4th quarter scan. Facility states all locations were successfully remediated on re-monitoring.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/31/2022	ROP SEMI 2 CERT	Compliance	<p>Oakland Heights - Section 1. Semi Annual Start-up, Shutdown and Malfunction (SSM) Report.</p> <p>July 1, 2021 - Sept 26, 2021, prior to Subpart AAAA effective date.</p> <p>The facility lists (23) start-up and (9) shut-down events having occurred. The facility report reads that all the events were consistent with the procedures listed in the SSM Plan.</p> <p>There were (5) malfunction events which may have caused an applicable limitation to be exceeded. Downtimes were between 1.9 to 5.67 hours due to blower overload, emergency alarm, and power supply fault.</p>
05/31/2022	ROP Annual Cert	Compliance	<p>Oakland Heights Development - Annual Report Jan.1, 2021 - Dec. 31, 2021. See reports dated ROP Semi 1 Cert (Jan 1 - June 30, 2021) dated 09-14-21, and ROP Semi 2 Cert (July 1 - Dec. 31, 2021) dated 03-10-22.</p>

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05/31/2022	ROP SEMI 2 CERT	Compliance	<p>Oakland Heights Development - 2nd Semi-Annual Report July. 1, 2021 - Dec. 31, 2021.</p> <p>EUALGCS: There were no wells which required oxygen or pressure corrections time beyond the 15-day limit NSPS notification requirement when the facility was subject to Subpart WWW prior to June 2021. The facility received an HOV approval for one gas well regarding a temperature exceedance in April 2021. There were no corrections needed for pressure or temperature after June 2021 when the facility became subject to Subpart OOO and then subpart AAAA in Sept. 2021.</p> <p>The facility did not expand the gas collection system during this reporting period. They were (8) replacement gas wells drilled during this reporting period.</p> <p>There were no instances when the entire collection system was not in operation in excess of five days.</p> <p>EUFLARE: There was (8) instance in which all controls were simultaneously off line for any duration of time. The downtimes were between 0.12 minutes and up to 5.15 hours due to blower overload, DTE panel replacement, flare maintenance, and emergency alarm errors. In addition, there were no instances when the flare did not record data for more than 15 minutes.</p> <p>The facility's H2S readings ranged from 187.5 to 375 ppm during this time frame. The 2nd semi-annual test revealed a concentration of 187.5 ppm.</p> <p>EULANDFILL: The facility reports there were (3) surface scan exceedances during 3rd quarter scan and (14) during the 4th quarter scans. All were successfully remediated within 30 days.</p>
05/27/2022	MAERS	Compliance	MAERS certification

Activity Date	Activity Type	Compliance Status	Comments
05/19/2022	ROP SEMI 2 CERT	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 07-01-21 to 09-26-21. This was time when the facility was still subject to Subpart OOO by way of WWW before opting in to Subpart AAAA which became effective on 09-27-21.</p> <p>Start-ups: 4 treatment events consistent with the SSM plan.</p> <p>Shutdown: 4 shutdown events consistent with the SSM plan.</p> <p>Malfunction: 4 treatment events consistent with the SSM plan.</p> <p>The above events occurred on 08-03, 08-05, 09-05, and 09-26 pertaining to the filter vessel and heat exchanger due to the events at the Oakland Heights Landfill.</p> <p>No revisions were made during this reporting period.</p>
05/18/2022	ROP SEMI 2 CERT	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 09-27-21 to 12-31-21. This was time period when the facility opted into the new Subpart AAAA provisions which became effective on 09-27-21.</p> <p>The facility reports no treatment system parameters were exceeded during this time period. The facility provides a description and the duration when the control device or treatment system were not operating per Subparts OOO and AAAA. The downtime varied between 0.1 to 7.3 hrs due to maintenance, blower overload, and power outages.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/18/2022	ROP Annual Cert	Compliance	<p>WMRE Annual Certification - Section 2</p> <p>See ROP SEMI 2 and 1 CERT for Semi-Annual reports and SSM dated 03/24/22 (for periods 07/01/20 to 12/31/20) and 09/23/20 (for periods 01/01/20 to 06/30/20).</p>
10/21/2021	ROP Semi 1 Cert	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Semi-Annual report from 01/01/21 to 06/30/21.</p> <p>EU-TREATMENTSYS: There were 5 instances during this reporting period when all control devices were shut down for more than one hour. Causes were due to high winds, maintenance, automatic shutdown of control device by designed protective systems (blower fault, loss of air pressure, utility issues, high-liquids alarm). Time periods varied between 1.25 - 4.18 hours.</p>
10/20/2021	ROP Semi 1 Cert	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 01/01/21 to 06/30/21.</p> <p>Start-ups: 2 treatment events all were consistent with the SSM plan.</p> <p>Shutdown: 0 shutdown events all were consistent with the SSM plan.</p> <p>Malfunction: 2 treatment events all were consistent with the SSM plan. These two events lasted 0.1 hr each and were related to loss of LFG flow due to changing pressure in the pipeline and PLC program corrupt and re-start disabled.</p> <p>No revisions were made this reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/19/2021	ROP Semi 1 Cert	Compliance	<p>Oakland Heights Development, Inc. - Section 1</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 01/01/21 to 06/30/21.</p> <p>Start-ups: 80 events.</p> <p>Shutdown: 14 events.</p> <p>Malfunction: 55 events. These all lasted between 0.02-7.70 hrs and were related to pilot flame failure, PLC programming corruption, loss of power, maintenance, automatic shutdown of control device by designed protective systems (blower fault, voltage change), and high winds.</p> <p>Facility states all were made consistent with the SSM Plan. No revisions were made this reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/19/2021	ROP Semi 1 Cert	Compliance	<p>Oakland Heights Development-Section 1</p> <p>Semi-Annual Report for Time Period Jan. 1, 2021 - June 30, 2021.</p> <p>EUALGCS: There were 3 wells which required additional oxygen, pressure, or temperature correction time beyond the 15 day limit per the permit in Section VI. All 3 wells received either an alternative operating or higher operating value. See the filed report for details.</p> <p>There was no time when the entire collection system was not operating in excess of 5 days. The facility states there were no new wells installed.</p> <p>EUFLARE: There were 3 instances when the temperature/flow meter did not record data for more than 15 minutes ranging from 22 min. to 2 hrs 48 min. due to maintenance. There was also 5 instances when all controls (flare and gas pipeline) were not operational for more than 1 hour. There was 1 instance when all controls were simultaneously not operational for any duration (high winds, maintenance, and automatic protective service shutdown). The flare does not have a bypass control system.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during the 1st quarter scan performed on March 19. There were 2 surface scan exceedances during the 2nd quarter scan performed on May 19. The areas were successfully remediated within 30-days.</p>

Name: Robert Joseph

Date: 01-19-23

Supervisor: Joyce [Signature]