

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : C&C Energy LLC	SRN : P0222
Location : 19401 15 MILE RD	District : Kalamazoo
	County : CALHOUN
City : MARSHALL State: MI Zip Code : 49068	Compliance Status : Compliance
Source Class : MAJOR	Staff : Matthew Deskins
FCE Begin Date : 7/11/2017	FCE Completion Date : 7/11/2018
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/11/2018	Scheduled Inspection	Compliance	Unannounced Scheduled Inspection
06/12/2018	Stack Test Observation	Compliance	Stack test observation. Turbine was being tested (annual test) for NOx and SOx as required under 40 CFR Part 60 Subpart KKKK.
05/16/2018	MAERS	Compliance	
03/26/2018	NSPS (Part 60)	Compliance	Although they don't specifically mention it in their submittal, this NSPS report is included as part of their semi-annual and annual ROP certification and relates to operation of their treatment system. This report has a few things that need to be reported if necessary but it typically just lists the downtimes of the control system greater than one hour. In the past, staff hasn't specifically added this report as a report received under Section 2 of C&C Landfill's SRN but I will make sure I do it now since Fortistar has been assigned their own SRN. Please see the semi-annual/annual ROP certifications for comments as well as that file for a copy of the report.

Activity Date	Activity Type	Compliance Status	Comments
03/26/2018	ROP SEMI 2 CERT	Compliance	They reported deviations for not maintaining records for five years, instances when the control device (engines and turbine) were down for more than an hour. The failure to maintain records for five years has been previously reported and staff does not consider the plant downtimes to be violations.
03/26/2018	ROP Annual Cert	Compliance	They reported deviations for not maintaining records for five years, instances when the control device (engines and turbine) were down for more than an hour. The failure to maintain records for five years has been previously reported and staff does not consider the plant downtimes to be violations.
03/26/2018	MACT (Part 63)	Compliance	This is the semi-annual SSM Report. The facility certified that they had 17 malfunctions occur during the reporting period. However, they also state that the actions taken to correct them were consistent with the procedures contained in their SSM Plan. In the past they reported all of their start-ups and shutdowns but the general provisions of Part 63 now state that they only have to if they have caused an exceedence.
09/28/2017	MACT (Part 63)	Compliance	This is the semi-annual SSM Report. The facility certified that they had 15 malfunctions occur during the reporting period. However, they also state that the actions taken to correct them were consistent with the procedures contained in their SSM Plan. In the past they reported all of their start-ups and shutdowns but the general provisions of Part 63 now state that they only have to if they have caused an exceedence.

Activity Date	Activity Type	Compliance Status	Comments
09/28/2017	ROP Semi 1 Cert	Compliance	They reported deviations for not maintaining records for five year, instances when the control device (engines and turbine) were down for more than an hour, and failing to test their turbine on time due to the turbine suffering a catastrophic event. The failure to maintain records for five years has been previously reported and staff does not consider the plant downtimes to be violations. Staff has already sent a VN for failing to test the turbine within the required timeframes.
09/28/2017	NSPS (Part 60)	Compliance	Although they don't specifically mention it in their submittal, this NSPS report is included as part of their semi-annual and annual ROP certification and relates to operation of their treatment system. This report has a few things that need to be reported if necessary but it typically just lists the downtimes of the control system greater than one hour. In the past, staff hasn't specifically added this report as a report received under Section 2 of C&C Landfill's SRN but I will make sure I do it now since Fortistar has been assigned their own SRN. Please see the semi-annual/annual ROP certifications for comments as well as that file for a copy of the report.
08/28/2017	Stack Test	Compliance	NOx, CO, VOC, SO2, and HCL emission testing on turbine. Results indicate compliance but staff has requested a review by TPU to ensure that is indeed the case. Staff will consider them in compliance at the present time unless proven otherwise.

Activity Date	Activity Type	Compliance Status	Comments
07/11/2017	Stack Test Observation	Compliance	Stack test observation. Turbine was being tested (annual test) for NOx and SOx as required under 40 CFR Part 60 Subpart KKKK. VOC, HCL, and CO were being tested as a condition of their ROP that stated that all pollutants had to be tested within 180 days of expiration of their ROP. According to TPU staff, the preliminary results look good but the compliance status could change depending on the final report.

Name: Matt Deh

Date: 7-19-18

Supervisor: MA 7/19/2018