

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : BLUE WATER RENEWABLES	SRN : P0262
Location : 6797 SMITHS CREEK ROAD	District : Southeast Michigan
	County : SAINT CLAIR
City : SMITHS CREEK State: MI Zip Code : 48074	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Rebecca Loftus
FCE Begin Date : 08/7/2012	FCE Completion Date : 9/25/2014
Comments : See also SRN: N6207, Smith's Creek Landfill . These are one stationary source.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/25/2014	ROP Semi 1 Cert	Non Compliance	<p>Semi Annual 1/1/14-6/30/14 Deviation Report: DTE reported two deviations for Blue Water Renewables during this time period. The first deviation was for missing H2S sampling for May and June. DTE used April's concentration to estimate emissions for May and June (the July sampling showed the concentration had decrease). The sampling requirement is now built into their electronic record keeping system and will be conducted as required in the future. The second deviation was exceeding the individual HAP limit in their ROP. In February 2013, a stack test was conducted for formaldehyde emissions, the results established an emission factor of 1.9 lbs/hr. The calculated 12 month rolling emissions for formaldehyde were 17 tons. The HAP limit of 9.0 tons was exceeded sometime in 2013 (the data provided only goes back to September 2013). In response to the exceedance, DTE stated that a permit modification will be submitted to the MDEQ as soon as possible, the notification and annual report for the RICE MACT will also be submitted, and they will provided more information on the exact date in which the HAP limit was exceeded. The AQD has issued a Violation Notice for this exceedance. Report reviewed by R. Loftus</p>
09/25/2014	MACT (Part 63)	Compliance	<p>Semi Annual 1/1/14-6/30/14, SSM Report: DTE reported 4 start-up events, 2 shutdown events, and 2 malfunctions at Blue Water Renewables for this time period. All reported events followed the current procedures in the SSM Plan, therefore no revisions were made to the SSM Plan. Reviewed by R. Loftus</p>

Activity Date	Activity Type	Compliance Status	Comments
09/25/2014	ROP Other	Compliance	Semi Annual 1/1/14-6/30/14, Report for EUTREATMENTSYS: According to DTE, the landfill gas treatment system at Blue Water Renewables had no exceedances or bypasses and was operated in accordance with the Monitoring Plan at all times. Five instances were recorded in which the system was down for more than 1 hour. These were all due to maintenance activities or engines being down. Reviewed by R. Loftus.
08/25/2014	Scheduled Inspection	Non Compliance	See inspection report for details.
03/25/2014	MAERS	Compliance	No changes were made to the submitted MAERS report. Facility is still not reporting formaldehyde emissions determined from formaldehyde emissions stack test on February 7, 2013.
03/19/2014	ROP Annual Cert	Compliance	No deviations were reported during the January 1, 2013, through December 31, 2013, reporting period.
03/19/2014	ROP SEMI 2 CERT	Compliance	The facility reported no exceedances, no diversions to a bypass line, and no periods in which the system was not operating for longer than 1 hour for the Landfill Gas Treatment System during the July 1, 2013, through December 31, 2013, reporting period.
03/19/2014	MACT (Part 63)	Compliance	No SSM events occurred during the July 1, 2013, through December 31, 2013, reporting period.
03/19/2014	ROP SEMI 2 CERT	Compliance	No deviations occurred during the July 1, 2013, through December 31, 2013, reporting period.
09/23/2013	MACT (Part 63)	Compliance	
09/23/2013	ROP Semi 1 Cert	Compliance	The facility reported no deviations for the January 1, 2013, through June 30, 2013, reporting period.
04/16/2013	Stack Test	Compliance	NOX, CO, NMOC Emission Test Report - Unit 1 and Unit 2

Activity Date	Activity Type	Compliance Status	Comments
04/16/2013	MACT (Part 63)	Compliance	The facility reported 1 startup, 1 shutdown, and no malfunction events during the July 1, 2012, through December 31, 2012, reporting period. The SSM Plan was followed for the startup and shutdown event. No revisions to the SSM Plan were made during the reporting period.
04/16/2013	ROP Annual Cert	Compliance	The facility reported no deviations during the January 1, 2013, through December 31, 2013, reporting period.
04/16/2013	Stack Test	Pending	Emission Test Report - Formaldehyde Study, Unit 2
04/16/2013	ROP SEMI 2 CERT	Compliance	The facility reported no deviations for the engines and treatment system for the July 1, 2013, through December 31, 2013, reporting period.
04/16/2013	ROP SEMI 2 CERT	Compliance	The facility reported no exceedances, no diversions of gas to a bypass line, and no instances in which the system was not operating for longer than 1 hour in duration for the Landfill Gas Treatment System for the July 1, 2013, through December 31, 2013, reporting period.
02/07/2013	Stack Test Observation	Non Compliance	Formaldehyde Stack Test
10/04/2012	ROP Semi 1 Cert	Compliance	Facility reported no deviations during the January 1, 2012, through June 30, 2012, reporting period.
10/03/2012	ROP Other	Compliance	Facility reported SSM events for EUTREATMENTSYS for the January 1, 2012, through June 30, 2012, reporting period. During this period, 7 startup, 4 shutdown, and 3 malfunctions occurred. The date, duration, and description of the malfunction events is in Table 1 of the semiannual SSM report. Corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
10/03/2012	ROP Other	Compliance	Facility reported SSM events for EUTREATMENTSYS for the January 1, 2012, through June 30, 2012, reporting period. During this period, 7 startup, 4 shutdown, and 3 malfunctions occurred. The date, duration, and description of the malfunction events is in Table 1 of the semiannual SSM report. Corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period.

Name:

Roberta J. [Signature]

Date:

9/25/14

Supervisor:

CTE