DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

Facility: SRN: **US ECOLOGY MICHIGAN** M4782 Location: 49350 N. I 94 SERVICE DR District: Detroit County: **WAYNE** City: **BELLEVILLE** State: MI Zip Code: 48111 Compliance Compliance Status: Source Class: **MAJOR** Staff: C. Nazaret Sandoval **FCE Completion** FCE Begin Date: 7/30/2020 7/30/2021 Date: Comments : FCE for FY 2021

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
06/11/2021	On-site Inspection	Compliance	FY 2021 Scheduled Inspection
05/25/2021	Other	Compliance	Report No. CA_M478258199 - Review and comments to the 2020 MAERS report. The review/audit was completed and passed on 5/25/2021.
03/18/2021	ROP SEMI 2 CERT	Compliance	ROP Section 1 - Semi-annual ROP certification for period 7/1/2020 to 12/31/2020, postmarked 3/18/2021. No deviations reported for the cited period.
03/18/2021	ROP SEMI 2 CERT	Compliance	ROP Section 2 - Semi-annual ROP certification for period 7/1/2020 to 12/31/2020, postmarked 3/18/2021. No deviations were reported during this period. After the EPA approval of the decommissioning of the existing landfill gas collection and control system (GCCS) on 5/16/2017 the facility proceeded to shut down the system. The engine operations at WER terminated on 12/27/2017 by turning off the landfill gas compressor and closing/locking-out the landfill gas feeding valve.

Activity Date	Activity Type	Compliance Status	Comments
03/18/2021	ROP Annual Cert	Compliance	ROP Section 3 - Annual ROP certification for period 1/1/2020 to 12/31/2020, postmarked 3/18/2021. No deviations or exceedances were reported. The passive vent system installed at the MSW landfill cells at Fons, Old Wayne and Site # 1 were decommissioned on 10/07/2017 after EPA approval on 5/16/2017. The active gas collection system at Site #2 landfill, which fed the electric generation plant at Wayne Energy Recovery (WER), was turned off on 12/27/2017. The facility submitted the ROP certification forms for Section 3 because the emission units listed in Section 3 are still part of the current ROP. This section will be revised during the ROP renewal process.
03/18/2021	ROP Annual Cert	Compliance	ROP Section 2 - Annual ROP certification for period 1/1/2020 to 12/31/2020, postmarked 3/18/2021. The engine operations at Wayne Energy Recovery (WER) terminated in December 2017. The facility still submits the ROP certification forms for Section 2 because the emission units (FGENGINES and EUTREATMENTSYS) regulated by the ROP on Section 2 are still part of the current ROP. This will be revised during the ROP renewal process.
03/18/2021	ROP Annual Cert	Compliance	ROP Section 1 - Annual ROP certification for period 1/1/2020 to 12/31/2020, postmarked 3/18/2021. No deviations were reported.
03/18/2021	CAM Excursions/Exceedan ces	Compliance	CAM monitor downtime and excursion/exceedance report for ROP Sections 1 to 3 POSTMARKED by AQD Detroit Office on 3/18/2021. No reported downtime, excursions or exceedances for period 7/1/2020 to 12/31/2020.

Activity Date	Activity Type	Compliance Status	Comments
03/18/2021	NESHAP (Part 61)	Compliance	ROP Section 1 - Annual report for year 2020 submitted in compliance with Part 61 Subpart FF Benzene NESHAP - Timely submitted, postmarked 3/18/2021. The facility reported the annual Total Annual Benzene (TAB) for MDWTP in compliance with 61.357(d) (2) and certified annual inspections per 61.354 (f) (1). No deviations reported.
03/18/2021	ROP SEMI 2 CERT	Compliance	ROP Section 3 - Semi-annual ROP certification for period 7/1/2020 to 12/31/2020, postmarked 3/18/2021. No deviations or exceedances were reported. The passive vent system at the MSW landfill cells installed at Font, Old Wayne and Site # 1 were decommissioned on 10/07/2017 after EPA approval on 5/16/2017. Therefore, the gas collection system is no longer subject to EG. The active gas collection system at Site #2 landfill (which fed the electric generation plant at Wayne Energy Recovery (WER)) was turned off on 12/27/2017. The facility submitted the ROP certification forms for Section 3 because the emission units listed in Section 3 are still part of the current ROP. This section will be revised during the ROP renewal process.

Activity Date	Activity Type	Compliance Status	Comments
03/18/2021	MACT (Part 63)	Compliance	ROP Section 1 - RTO Semi-Annual Planned Routine Maintenance Report pursuant to NESHAP from Off-Site Waste and Recovery Operations (40 CFR 63.697 Subpart DD) - Period 7/1/2020 to 12/31/2020 - Postmarked 3/18/2021. This report summarizes the RTO planned scheduled (S) maintenance activities for the cited period. In addition, all unscheduled (U) repairs and/or malfunctions to the RTO resulting in the system shutdown have been documented. All treatment operations are ceased during RTO downtime to assure permit compliance. During this period, the RTO was shut-down for the 3 and 6 month routine maintenance and the annual RTO calibration. On 9/5/2020 the facility recorded about 18 hours-downtime during a 3-month maintenance. Also reported was a shutdown in 9/19 and 9/20 for building electrical maintenance. The East Treatment Building was shutdown for maintenance for 10-days from 10/16 to 10/26. A combined 3 and 6-month scheduled maintenance occurred in12/5 and a scheduled shut down in 12/26 to clean the scrubber tank. The unscheduled (U) downtime varied from short spans of 20 to 30 minutes to several hours, depending on the causes; which included: repair water booster pump, power outages, scrubber system cleaning, service air compressor system, etc.
03/15/2021	MAERS	Compliance	2020 MAERS report submitted on March 15, 2021. The Supplemental Control Template requested by AQD-ERAU was also submitted electronically with the report. AQD audited the MAERS report. For audit/review and comments refer to report No. CA_M478258199.

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09/15/2020	ROP Semi 1 Cert	Compliance	ROP Section 1 - Semi-annual ROP certification for period 1/1/2020 to 6/30/2020, postmarked 9/15/2020. No deviations were reported for the cited period.
09/15/2020	ROP Semi 1 Cert	Compliance	ROP Section 2 - Semi-Annual ROP certification for period 1/1/2020 to 6/30/2020, postmarked 9/15/2020. No deviations reported for the cited period. The engine operations at Wayne Energy Recovery (WER) terminated on 12/27/2017 after the decommissioning of the landfill gas collection and control system. The landfill gas compressor was turned-off and the landfill gas feeding valve was locked-out. The facility submitted ROP certification for Section 2 because the emission units (FGENGINES and EUTREATMENTSYS) are still part of the current ROP. This will be revised during the ROP renewal process.
09/15/2020	ROP Semi 1 Cert	Compliance	ROP Section 3 - Semi-annual ROP certification for period 1/1/2020 to 6/30/2020, postmarked 9/15/2020. No deviations or exceedances were reported for the cited period. The passive vent system installed at the MSW landfill cells at Fons, Old Wayne and Site # 1 were decommissioned on 10/07/2017 after EPA approval on 5/16/2017. The active gas collection system at Site #2 landfill, which fed the electric generation plant at Wayne Energy Recovery (WER), was turned off on 12/27/2017. The facility submitted ROP certification for Section 3 because the emission units listed in Section 3 are still part of the current ROP. This section will be revised during the ROP renewal.

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08/24/2020	ROP Other	Compliance	As required by Section 1 of MIROP-M4782-2010a for FG East/SC V.2 and FG West/SC V.3; US Ecology provided notification (via email received on 8/13/2020) of the plans for conducting Procedure - T and negative static pressure test at the East and West treatment buildings on 8/21/2020, if weather permits. On 8/24/2020 I received confirmation that the test was conducted as planned and the results demonstrated negative pressures.

Name:	Nazaret Handoral	Date:	8/5/2021	Supervisor:	JK	
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