

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Brent Run Landfill	<b>SRN :</b> N5987
<b>Location :</b> 8335 W. Vienna Rd	<b>District :</b> Lansing
	<b>County :</b> GENESEE
<b>City :</b> MONTROSE <b>State:</b> MI <b>Zip Code :</b> 48457	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Michelle Luplow
<b>FCE Begin Date :</b> 12/3/2017	<b>FCE Completion Date :</b> 1/8/2019
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
12/12/2018	ROP Other	Compliance	ACT request was made for oxygen levels >5% in BRLF0099 for 11/21/18. O2 exceedance first detected 11/6/18. Request does not exceed 120 days and requests made within 15 days of original detection of exceedances. ACT approved for 2/4/19. See file for details.
12/03/2018	Scheduled Inspection	Non Compliance	Scheduled, announced compliance inspection to determine compliance with MI-ROP-N5987-2015a.
11/30/2018	Stack Test Observation	Compliance	Stack Test Protocol, per performance objectives, that need to be identified/recorded during the EUENGINE3 and EUENGINE6. Stack Test scheduled for November 30, 2018. Includes data collected during the stack test.

Activity Date	Activity Type	Compliance Status	Comments
10/24/2018	ROP Other	Compliance	Request to decommission BRLF0014 due to consistent elevated oxygen levels over a period of 5 months. Well is located in an older area of landfill that produces low-quality methane gas. O2 and Methane levels submitted, as well as EPA ADI guidance allowing for decommissioning of the well by turning off vacuum valves (which can be opened if SEM exceed 500 ppm std in that area). Decommission request approved 10/24/18
10/12/2018	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Certification for the Electric Generation Plant (Section 2), including cert for SSM report on EUTREATMENTSYS and FGRICEMACT. No deviations reported. Dennis Bollinger, certified as Responsible Official.
10/12/2018	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction semi-annual report per NESHAP subpart AAAAA (MACT Part 63) for MI-ROP-N5987-2015a, Section 2 of ROP. 3 start-up, 1 shutdown, and 2 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Todd Davlin.
10/12/2018	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Certification for Brent Run Landfill (Section 1). No deviations reported for 1/1/2018 - 6/30/18 reporting period. Tim Church signed as Responsible Official
10/12/2018	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction report per NESHAP subpart AAAAA (MACT Part 63) for MI-ROP-N5987-2015a Section 1 of ROP. 29 start-up, 2 shutdown, and 1 malfunction event were documented. A statement was made that actions taken at facility for all SSM events were consistent with SSM plan. 1 malfunction was associated with unrecorded data on EUOPENFLARE (1/12/18 for 4.13 hrs). Certified by Responsible Official Tim Church.

Activity Date	Activity Type	Compliance Status	Comments
10/12/2018	NSPS (Part 60)	Compliance	<p>Semi-annual report for the GCCS: EUACTIVECOLL, EULANDFILL, EUTREATMENTSYS, and EUOPENFLARE and EUENCLOSEDFLARE.</p> <p>EULANDFILL 1st and 2nd quarter surface monitoring for methane on 3/21/18 and 6/14/18- no exceedances of 500 ppm limit for either quarter, conducted according to ROP requirements, using 90% of stabilized reading. Protrusion monitoring, although not required (is only required for NSPS Subpart XXX-subject facilities), was also conducted, with noted exceedances only in the first quarter.</p> <p>GCCS EUACTIVECOLL: There was 1 instance of elevated temperature greater than 131F exceeding 15 days (HOV was approved). Wells 0075 and 0089 had O2 levels&gt;5% for more than 15 days. All O2 exceedances were corrected within the requested alternative operating timeline, except Well 0075 which was decommissioned. Wells 0114, 0084, HC01 and HC02 experienced positive or neutral pressure was observed exceeding 15 days, all were corrected within appropriate timeframe.</p> <p>EUTREATMENT, EUOPENFLARE &amp; EUENCLOSEDFLARE: One period of control device (GCCS) downtime exceeding 1 hour as the result of power loss; no gas stream diversions as they do not have a bypass line.</p>
08/31/2018	ROP Other	Compliance	<p>ACT request was made for oxygen levels &gt;5%in BRLF0042 for 11/14/18; and ACT request was made for elevated temperatures in BRLF088R for 11/20/18. Request does not exceed 120 days and requests made within 15 days of original detection of exceedances. See file for details.</p>
08/17/2018	Other	Compliance	<p>HOV request of 140F for BRLF0115 for May 2018 Wellfield Monitoring</p>

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07/06/2018	NSPS (Part 60)	Compliance	<p>2nd Semi-annual report for the GCCS which includes EULANDFILL, EUACTIVECOLL, and EUTREATMENTSYS. EULANDFILL quarterly surface emission monitoring for methane (9/18-19/17 &amp; 12/18-19/17) - there were 4 exceedances of the 500 ppm surface methane limit in the 2nd quarter. New wells required to be installed by 4/19/18 to correct the SEM exceedances. GCCS EUACTIVECOLL: All O2, Temperature or pressure exceedances have been addressed throughout the reporting period via monthly reports and requests for an ACT when exceedances could not be corrected within the 15-day time-frame. EUTREATMENTSYS: 1 instance of control device (treatment system, closed, &amp; open flare) downtime (for wellfield maintenance) that exceeded 1 hour, no gas stream diversions as they do not have a bypass line. Certified by Tim Church, responsible official</p>
07/06/2018	MACT (Part 63)	Compliance	<p>Start up, Shut down, and malfunction semi-annual report per NESHAP subpart AAAAA (MACT Part 63) for MI-ROP-N5987-2015, Section 2 of ROP. 6 start-up, 3 shutdown, and 3 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility, for the 3 Treatment System malfunctions. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Dennis Bollinger.</p>
07/06/2018	ROP R215 Notification	Compliance	<p>Change in responsible official effective 8/19/17: Dennis Bollinger, VP Assets &amp; Regulatory Affairs.</p>
07/06/2018	MAERS	Compliance	<p>MAERS certification for 1/1/2017-12/31/2017 received March 17, 2018, for MI-ROP-N5987-2015a;electronically received 3/16/17. Certified by Responsible Official Tim Church. Check MAERS for any review comments.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/06/2018	ROP Annual Cert	Compliance	Annual Report Certification. Certified for MI-ROP-N5987-2015a. Source certifies compliance with all terms and conditions. Certified by Responsible Official Dennis Bollinger.
07/06/2018	ROP SEMI 2 CERT	Compliance	Semi-Annual Compliance Certification for Electric Generation Plant (Section 2). Reported 0 deviations. Dennis Bollinger certified as Responsible Official
07/06/2018	MACT (Part 63)	Compliance	Annual MACT Subpart ZZZZ report for EUENGINES 3-6. Engines 3, 4 and 6 averaged 550-575 scfm landfill gas; engine 5 averaged 191 scfm landfill gas at 52% methane. Only landfill gas is used, therefore a demonstration that at least 10% of the heat input is from landfill gas is not applicable. Dennis Bollinger certified as Responsible Official.
07/06/2018	MAERS	Compliance	MAERS certification for 1/1/2017-12/31/2017 received March 16, 2017 for MI-ROP-N5987-2015 Section 2; certified by Responsible Official Dennis Bollinger. Check MAERS for any review comments.
06/28/2018	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5987-2015a Section 1 of ROP. 20 start-up, 3 shutdown, and 4 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by Responsible Official Tim Church
06/22/2018	ROP SEMI 2 CERT	Compliance	Semi-Annual Compliance Certification for Landfill (Section 1). Deviations reported for 7/1/2017 - 12/31/2017 reporting period. Tim Church, Responsible Official signed. Deviations reported for failure to request an alternative compliance timeline within 15 days well exhibiting elevated oxygen levels.

Activity Date	Activity Type	Compliance Status	Comments
06/22/2018	ROP Annual Cert	Compliance	Annual Compliance Certification for Brent Run Landfill (Section 1) under MI-ROP-N5987-2015 (1/1/17 - 4/27/17) and MI-ROP-N5987-2015a (4/28/17 - 12/31/17). Certified by Responsible Official Tim Church. 1 deviations reported for EUACTIVECOLL.(October 2017)
05/21/2018	ROP Other	Compliance	SSM report for decommissioning of BRLF0075 (decommissioned 4/13/18). SSM reports for the completion of installation of 11 new wells to address the 500 ppm SEM exceedances documented in the 4th quarter 2017 (decommissioned 4/13/18, due date was 4/19/18). ACT request was made for positive pressure detected at wells BRLF0114, BRLF006B, BRLF006C, BRLF0056, BRLF0057, BRLF0077, BRLF0078, BRLF0079, BRLF0084, BRLFHC01, BRLFHC02. ACT request was made for elevated temperatures at BRLF0115. Decommissioning request for BRLF0089 (BRLF0089R will collect LFG in its place)
04/06/2018	MACT (Part 63)	Compliance	3/30/18 submittal of an ACT approval request for correction of oxygen levels in excess of 5% at well BRLF0089 and decommissioning of BRLF0075 which, under ACT for 3/12/18 could not be corrected to below 5% oxygen levels. O2 exceedance detected 3/16/18, requested ACT for BRLF0089 of 6/6/18 to correct oxygen levels. Request made within 15 days of detection. Both approved under "BRL Wellfield Matrix 2018 3-28-18."
03/08/2018	Other	Compliance	PCE: Surface Emission Monitoring exceedances for 4th quarter; Alternative Compliance Timeline for BRLF0075 reviewed

Activity Date	Activity Type	Compliance Status	Comments
01/24/2018	Stack Test	Compliance	Emissions testing per MI-ROP-N5987-2015a. Testing conducted November 30, 2017 on EUENGINE3 and EUENGINE6 for NOx, CO, and VOC for the NSPS JJJJ. Test results provide information to determine compliance with lb/hr SOM limits as well. Report from Derenzo & Associates indicates permit limit compliance for all pollutants tested for both NSPS and permit emission limits while operating under maximum routine operating conditions (within 10% of its maximum capacity). The stack test report Executive Summary process data are within the parameter ranges I recorded during the stack test as well. Todd Davlin certified as Responsible Official
01/03/2018	Other	Compliance	HOV and ACT requests for December 2017 Wellfield Monitoring

Name: Muhammad Lopez

Date: 4/8/19

Supervisor: B.M.