

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Brent Run Landfill	SRN : N5987
Location : 8335 W. Vienna Rd	District : Lansing
	County : GENESEE
City : MONTROSE State: MI Zip Code : 48457	Compliance Status : Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 7/1/20	FCE Completion Date : 8/4/2021
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/23/2021	ROP Annual Cert	Compliance	Annual Report Certification. Certified for MI-ROP-N5987-2015a. Source certifies compliance with all terms and conditions, except for 8 deviations reported for failure to record continuous readings on kW output and fuel flow throughout 2020 for FGICEENGINES. Certified by Responsible Official Dan Zimmerman
07/23/2021	ROP SEMI 2 CERT	Compliance	Semi-Annual Compliance Certification for EDL Electric Generation Plant (Section 2). Reported 6 deviations under MI-ROP-N5987-2015A, for 3 instances where continuous recording of kW & fuel flow on EUENGINE6 was not conducted, as well as 3 instances where kW & fuel flow was not continuously recorded for FGICEENGINES. Dan Zimmerman certified as Responsible Official

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07/23/2021	MACT (Part 63)	Compliance	Annual NESHAP Subpart AAAA report for MI-ROP-N5987-2015a, Section 2. All engines burn landfill gas only. The 3520 engines average 466-580 scfm, the 3512 engine averages 165-220 scfm. Engines were operated in accordance with all operating limits, excluding the SO2 exceedance on the 3520 engines, addressed in prior communications and VNs.
07/23/2021	MACT (Part 63)	Compliance	Start up, Shut down, and malfunction EUTREATMENTSYS semi-annual report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5987-2015a, Section 2. 2 start-up, 0 shutdown, and 2 malfunction events were documented for EUTREATMENTSYS. Specific malfunction events are included in the SSM event report. Actions taken at facility for all SSM events were reported to be consistent with SSM plan. Certified by authorized representative Dan Zimmerman.
07/23/2021	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. 9 start-up, 7 shutdown, and 2 malfunction events were documented for EUOPENFLARE, and 8 startups, 4 shut downs and 0 malfunctions for the wellfield. Specific 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
07/01/2021	On-site Inspection	Compliance	Announced, scheduled compliance inspection to determine compliance with MI-ROP-N5987-2015a and PTI 176-18.

Activity Date	Activity Type	Compliance Status	Comments
06/30/2021	NSPS (Part 60)	Compliance	<p>2nd Semi-annual GCCS report which includes EULANDFILL, EUACTIVECOLL, and EUTREATMENTSYS.</p> <p>EULANDFILL quarterly surface emission monitoring for methane there was 1 exceedance of the 500 ppm surface methane limit in the 3rd quarter (10-day recheck passed). There were no exceedances in the 4th quarter.</p> <p>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.</p> <p>EUTREATMENTSYS: 0 instance of control device (treatment system, closed, & open flare) downtime (for wellfield maintenance) that exceeded 1 hour, no gas stream diversions as they do not have a bypass line.</p> <p>Certified by Tim Church, responsible official</p>
06/30/2021	ROP Annual Cert	Compliance	<p>Annual Compliance Certification for Brent Run Landfill (Section 1) under MI-ROP-N5987-2015a (1/1/20 - 12/31/20). Certified by Responsible Official Tim Church. 1 deviations reported, occurred during second semi-annual period (operating flare without flame lit).</p>
06/30/2021	ROP SEMI 2 CERT	Compliance	<p>Second Semi-Annual Compliance Certification for Brent Run Landfill (Section 1) under MI-ROP-N5987-2015a (7/1/20 - 12/31/20). Certified by Responsible Official Tim Church. 1 deviation reported for operating EUOPENFLARE without a flame.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/24/2021	Stack Test	Compliance	Electronic copy rec'd 1/5/21. Hard copy rec'd 4/9/21. Energy Developments Michigan (EDM) stack test report. Emissions testing for PTI 176-18 and MI-ROP-N5987-2015a. Testing conducted December 1-2, 2020 on EUENGINE3, EUENGINE4, EUENGINE6 and EUENGINE7 for NOx, CO, and VOC for the NSPS JJJJ limits. Report from Impact Compliance & Testing indicates compliance for all pollutants tested 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. Dan Zimmerman certified as Responsible Official.
03/19/2021	MAERS	Compliance	2020 MAERS received electronically 3/15/21. MAERS certification for Section 1 received 3/19/21. Check MAERS for any review comments.
12/01/2020	Stack Test Observation	Compliance	Virtual stack test observation of EUENGINE3 and EUENGINE4 testing.
11/17/2020	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Certification for Brent Run Landfill (Section 1). 0 deviations reported for 1/1/20 - 6/30/20 reporting period. Tim Church signed as Responsible Official
11/17/2020	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, 18 shutdown, and 2 malfunction events were documented. A statement was made that actions taken at facility for all SSM events were consistent with SSM plan. 2 malfunctions were associated with unrecorded data on EUOPENFLARE due to a malfunction with the flow monitor. Certified by Responsible Official Tim Church.

Activity Date	Activity Type	Compliance Status	Comments
11/17/2020	NSPS (Part 60)	Compliance	<p>Semi-annual report for the GCCS: EUACTIVECOLL, EULANDFILL, EUOPENFLARE and EUENCLOSEDFLARE. EULANDFILL 1st and 2nd quarter surface monitoring for methane on 2/11/20 and 5/27/20- no exceedances of 500 ppm limit for either quarter, conducted according to ROP requirements, using 90% of stabilized reading. Protrusion monitoring, was also conducted, with no noted exceedances.</p> <p>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.</p> <p>EUTREATMENT, EUOPENFLARE & EUENCLOSEDFLARE: There were no periods of control device (treatment, open/enclosed flares) downtime exceeding 1 hour</p>
11/17/2020	ROP Semi 1 Cert	Compliance	<p>Semi-Annual Compliance Certification for the Electric Generation Plant (Section 2). Six deviations reported. FGICEENGINES and EUENGINE 6 were not continuously monitored and recorded for landfill gas usage, kW and operating hours for 4 occurrences (1/13/20, 3/26/20, 4/27/20, 6/16/20). Certified by Dan Zimmerman, authorized representative</p>
11/17/2020	MACT (Part 63)	Compliance	<p>1st Semi-annual Start up, Shut down, and malfunction semi-annual report per NESHAP subpart AAAA (MACT Part 63) for MI-ROP-N5987-2015a, Section 2 of ROP. 9 start-up, 2 shutdown, and 7 malfunction events were documented. Specific malfunction events are included in the SSM event report, maintained at the facility, for the malfunctions. Actions taken at facility for all SSM events were consistent with SSM plan. Certified by authorized representative Dan Zimmerman.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/21/2020	Stack Test	Compliance	Test report for verification of SO2 emissions for PTI 176-18 (not yet rolled into ROP) on EUENGINE3, EUENGINE4 and EUENGINE6, as a retest to December 2019 failed SO2 tests. Limit on each engine is 3.56 lb/hr. Emissions were 2.46 lb/hr, 2.26 lb/hr and 2.42 lb/hr, respectively. Draeger tube, gas analysis, and operational data was reviewed - all appear to be in agreement with what I observed during the test on 7/30/20.
07/30/2020	Stack Test Observation	Compliance	Stack Test Observation for retesting of EUENGINE3, 4 and 6. Observed EUENGINE4 and 3 testing on 7/30/20. Test was conducted to resolve VN for SO2 exceedances on these 3 engines during the December 2019 test.

Name: Michelle Luplow Date: 8/5/21

Supervisor: B.M.