

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : City of Midland Utilities Division	SRN : N6004
Location : 4311 E. Ashman St.	District : Saginaw Bay
	County : MIDLAND
City : MIDLAND State: MI Zip Code : 48642	Compliance Status : Compliance
Source Class : MAJOR	Staff : Gina McCann
FCE Begin Date : 12/27/2017	FCE Completion Date : 10/4/2018
Comments : FCE from 12/27/2016 through 10/4/2018	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
10/03/2018	Scheduled Inspection	Compliance	Inspection of MI-ROP-N6004-2014
09/24/2018	ROP Semi 1 Cert	Compliance	MLC-16B02 and MLC-16C02 were not monitored. Will review monitoring in a more timely matter to reduce reoccurrence.
09/24/2018	NSPS (Part 60)	Compliance	MLC-16B02 and MLC-16C02 were not monitored. Will review monitoring in a more timely matter to reduce reoccurrence.
09/24/2018	MACT (Part 63)	Compliance	Semi Annual SSM Report. (16) events occurred. Shutdown, days and time vary, for wells MLVW-2, MLVDW-2, MLGW-2, MLTCO15S, MLGW-19 and MLVW-11 to drain or clean out pumps. Methane sensor in the compressor building malfunctioned and caused flare to shut down. GCCS shutdown to raise wells MLGW-22 9 (by 6') and MLGW-12A (by 10'). Start-up MLC16B10 and MLC16C10. Power surge knocked out power causing blower fault. Scheduled programming and shutdown on flare one day. Repair to manhole, shutdown MLS11-12..

Activity Date	Activity Type	Compliance Status	Comments
09/05/2018	Excess Emissions (CEM)	Unknown	<p>Surface Emissions Monitoring Results for Q2. (4) exceedances total; (2) of (4), 2018-Q2-1 and 2018-Q2-3 had three monitoring event during the second quarter above 500 ppm.</p> <p>CML believes due to settling at these two manholes which has resulted in obstruction of gas flow around the toe-drain that are associated with them. The planned repairs will be completed no later than 120 calendar days from the initial exceedance, or by 9-12-2018.</p> <p>Email dated 8-1-2018 requested SEM scan requested after the collection line repaired.</p>
09/05/2018	Excess Emissions (CEM)	Unknown	<p>EPA SEM Audit.</p> <p>(4) exceedances. EPA-2 had three monitoring events when methane concentrations exceeded the 500 ppm. Installing a collection device. The manhole will be connected to the gas collection system using a remote wellhead. The new collection device will include a positive closing throttle valve, any necessary seals and couplings, access couplings and at least one sampling port in accordance with 40 CFR 60.759 (b)(3). Expansion completed no later than 9-4-2018.</p>
04/03/2018	ROP SEMI 2 CERT	Non Compliance	<p>ML-VDW06 and MLC-16C06 were not monitored, inadvertently missed.</p>
04/03/2018	ROP Annual Cert	Non Compliance	<p>Failure to perform monthly pressure, oxygen and temperature measurements at MLC-16A07 and MLTCO-14. Failure to continuously monitor the total LF gas and digester gas fuel usage. ML-VDW06 and MLC-16C06 were not monitored, inadvertently missed.</p> <p>(2) SEM exceedances. (1) on SW corner of cells 1-8 and the other on west side of cell 16, both were in compliance during 10 day re-check.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/03/2018	NSPS (Part 60)	Non Compliance	2017 NSPS Annual Report ML-VDW06 and MLC-16C06 were not monitored, inadvertently missed. (2) SEM exceedances. (1) on SW corner of cells 1-8 and the other on west side of cell 16, both were in compliance during 10 day re-check.

04/03/2018	MACT (Part 63)	Compliance	<p>Semi Annual SSM Report (21) SSM events. 6/2/2017 (2 hrs) false methane sensor alarm in LFGTE. 7/4/17 (1.15 hrs) Malfunction of generator detonation at GTE, GCCS automatically restarted. 7/6/17 (1.30 hrs) power outage at LF compressor, system manually restarted. 7/7/17 (1.2 hrs) Malfunction of detonation sensor caused GTE facility to go offline, system automatically restarted. 7/8/17 (1.40 hrs) Malfunction of generator detonation sensor at GTE facility led to system shutdown. System manually restarted. 7/20/17 (1.15 hrs) Malfunction at GTE facility led to GCCS and treatment system shutdown. System manually restarted. 7/30/17 (1.45 hrs.) Methane detection alarm in LFGTE facility caused automatic safety shutdown of all systems. System manually restarted and small methane leak was repaired. 8/15/17 (3.10 hrs) Malfunction of flare led to GCCS and treatment system shutdown during Consumers Energy system maintenance. System manually restarted. 8/15/17 (1 hr.) Malfunction of flare led to collection system and treatment system shutdown during Consumers Energy system maintenance. System manually restarted. 8/16/17 (1.20 hrs) Malfunction of flare led to collection system and treatment system shutdown during Consumers Energy system maintenance. System manually restarted. 8/31/17 (1.10 hrs) LF Compressor malfunction caused GCCS and treatment system shutdown. System manually restarted. 9/9/17 (1.5 hrs) Power outage caused system shutdown. Manual restart required. 9/9/17 (2.4 hrs) GTE facility experience turbo/exhaust and flare malfunctions. System restarted once issues were realized. 9/21/17 (7 hrs) Malfunction caused Consumers Energy generator to go offline. Reset of flare necessary before restart was completed. 10/06/17 (1.10 hrs) System shutdown due to Gen2</p>
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04/03/2018	MACT (Part 63)	Compliance	turbo actuator abnormal update rate (wiring issue). Switched to Gen1. Flare pilot fault, did not light. 10/7/17 (1.50 hrs) Weather related power outage caused shutdown of GTE facility. Flare unable to light during outage. System restarted once power was restored. 10/15/17 (3.35 hrs.) Weather related power outage caused shutdown of collection system. System restarted once power was restored. 11/22/17 (2.45 hrs) Consumers Energy power outage caused shutdown of system. Manual restart required. 12/7/17 (3.1 hrs) Methane sensor fault in compressor building caused automatic safety shutdown of system. System restarted once personnel verified it was a faulty alarm and recalibrated sensors. 12/8/17 (2.15 hrs) Methane sensor fault in compressor building caused automatic safety shutdown of system. System restarted once personnel verified it was a faulty alarm and recalibrated sensors. 11/17/17 Collection system start-up of new gas well, MLC-16B11.
02/21/2018	Stack Test	Compliance	NSPS JJJ stack test results for engine #2. Emissions under permitted values.
01/03/2018	Stack Test Observation	Unknown	NSPS JJJJ test on engine #2

Name:

Sean R. McCann

Date:

10/4/18

Supervisor:

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