

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> City of Midland Utilities Division	<b>SRN :</b> N6004
<b>Location :</b> 4311 E. Ashman St.	<b>District :</b> Bay City
	<b>County :</b> MIDLAND
<b>City :</b> MIDLAND <b>State:</b> MI <b>Zip Code :</b> 48642	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Gina McCann
<b>FCE Begin Date :</b> 10/5/2018	<b>FCE Completion Date :</b> 9/28/2022
<b>Comments :</b> FCE. Non-compliance of NESHAP for monitoring of one well ML-VDW06 during 2022 inspection. A violation notice was sent to address.	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
09/27/2022	Stack Test Observation	Unknown	NSPS JJJJ testing
08/30/2022	On-site Inspection	Non Compliance	FCE inspection including SEMs abbreviated survey. Letter mailed to company of results on 9/13/2022, sent by Mike Kovalchick
06/17/2022	ROP Other	Compliance	Initial Liquids Addition Reporting: 40 CFR 62, Subpart OOO
04/05/2022	ROP Other	Compliance	Semi Annual SSM Report. No longer required after 9/27/2021.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	MACT (Part 63)	Compliance	<p>Semi Annual NESHAP AAAA Report and Annual Federal Plan Report</p> <p>Open Flare- FG-RICEMACT VI.1 &amp; MACT AAAA-flow date for digester gas and landfill gas to the engines, periods of missing data related to recorder software issues.</p> <p>Statement certifying prior submission of the respective reports in the first semi-annual report required 63.1981(h) constitutes compliance with the submittal requirements 63.198(a) through (g) and (l).</p> <p>Federal Plan Nine (9) wellhead pressure exceedances. Corrected within fifteen (15) days, no root cause analysis required. No SEM exceedances reported.</p> <p>Five (5) new wells installed MLC16E02 through MLC16E06. All installed 8/30/2021.</p>
04/05/2022	MACT (Part 63)	Compliance	Annual RICE MACT Report
04/05/2022	ROP SEMI 2 CERT	Compliance	EU-OPENFLARE and GTE Engines missing flow and temperature data. Nine (9) separate events w/longest being approximately a week due to background service faulted and did not send an email notification to alert the site of the issue.
04/04/2022	ROP Annual Cert	Compliance	EU-OPENFLARE and GTE Engines missing flow and temperature data. Nine (9) separate events w/longest being approximately a week due to background service faulted and did not send an email notification to alert the site of the issue.
10/01/2021	ROP R215 Notification	Compliance	MACT AAAA opt-in

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09/30/2021	ROP Semi 1 Cert	Compliance	<p>Two deviations total. The first for not recording flow on open flare and the second for not recording flow on the GTE.</p> <p>Open flare had (2) instances when the flow recorder did not record flow. (1) due to storage disk removed to download data (1 hr, 21 mins) and (1) for power off for thermocouple repairs (40 mins).</p> <p>GTE Engines had (3) instances when the flow recorder did not record flow. (1) Accidentally powered off (13 hrs, 25 mins), (1) Power issues (54 mins) and (1) flow recorder power issues (30 mins)</p>
09/30/2021	ROP Other	Compliance	SSM Plan. Several events all appeared to be consistent with their SSM plan.
09/30/2021	NSPS (Part 60)	Compliance	Semi Annual NSPS Report Q1 SEM-no exceedance Q2-1 initial exceedance at well MLS 11-12, cleared in 10-day monitoring
04/15/2021	Stack Test	Compliance	<p>EUICEENGINE1-2 EUENGINE1 NOx=0.65 g/bhp-hr limit=1.0 g/bhp-hr CO=2.62 g/bhp-hr limit=4.2 g/bhp-hr VOC 0.09 g/bhp-hr limit-1.0 g/bhp-hr</p> <p>EUENGINE2 NOX 0.70 g/bhp-hr limt 1.0 g/bhp-hr CO 2.35 g/bhp -hr limt 4.2 bhp-hr VOC 0.09 bhp-hr limit= 1.0 bhp-hr</p>
03/25/2021	ROP Other	Compliance	Semiannual SSM Plan Report, MACT AAAA reporting.
03/25/2021	MACT (Part 63)	Compliance	Subpart ZZZZ. No deviations.
03/25/2021	ROP SEMI 2 CERT	Compliance	<p>(1) well, GW-19B +pressure in excess of 15 days (2) wells MLS11-12 and MLS7-8 O2&gt;5% 8/30/20 Flare down &gt;1hr.replaced sensor</p>
03/25/2021	ROP Annual Cert	Compliance	<p>(1) well, GW-19B +pressure in excess of 15 days (2) wells MLS11-12 and MLS7-8 O2&gt;5% 8/30/20 Flare down &gt;1hr.replaced sensor</p>

Activity Date	Activity Type	Compliance Status	Comments
03/25/2021	NSPS (Part 60)	Compliance	(1) well, GW-19B +pressure in excess of 15 days (2) wells MLS11-12 and MLS7-8 O2>5% 8/30/20 Flare down >1hr.replaced sensor
10/14/2020	NSPS (Part 60)	Compliance	Semi annual NSPS report EU-ACTIVECOLL VI.1 GW19-B failed to request alternative timeline request. Thought to be under alt timeline with adjacent wells.
10/14/2020	ROP Other	Compliance	Semi annual SSM report • 19 SSM events all consistent with SSM plan. No updates to plan.
10/14/2020	ROP Semi 1 Cert	Compliance	<ul style="list-style-type: none"> <li>• EU-ACTIVECOLL VI.1 GW19-B failed to request alternative timeline request. Thought to be under alt timeline with adjacent wells.</li> <li>• EU-ACTIVECOLL VI.1 MLTC015S and MLS09-10 failed to request alternative timeline request due to staggering of shifts due to covid. In compliance on day 20.</li> <li>• FG-RICEMACT report submitted late. Requested change deadline to comply with ROP Semi-annual reports.</li> </ul>
04/14/2020	MACT (Part 63)	Non Compliance	Subpart ZZZZ (RICE MACT) annual report Information in report is correct. The report was due on January 31, 2020.

Activity Date	Activity Type	Compliance Status	Comments
04/06/2020	ROP Annual Cert	Compliance	<p>EU-ACTIVECOLL- Failed to perform monthly pressure, oxygen and temperature monitoring at MLC16A01, MLC16B01 and MLC16C04. During the period, monthly monitoring of 3 gas wells was inadvertently missed despite timely review of data by the landfill manager. The facility was relying on a pivot table to review data which had pulled in historic information kept in the same spreadsheet. The issue was corrected to eliminate future error.</p> <p>EU-ACTIVECOLL- failure to perform corrective action for pressure exceedances of MLGW-23 within 5 calendar days due to a misunderstanding that a previously approved positive pressure variance was still in effect. Files were updated to document the variance had expired so the error was not repeated. The well was in compliance during the next monthly reading.</p> <p>11/25/2019 (29 days) Failure to perform corrective action for an O2 exceedance for MLS09-10. though had an O2 variance in place for this well. Only had pressure variance approved. Records were updated to reduce likelihood of happening again.</p>
04/06/2020	ROP SEMI 2 CERT	Compliance	<p>11/25/2019 (29 days) Failure to perform corrective action for an O2 exceedance for MLS09-10. though had an O2 variance in place for this well. Only had pressure variance approved. Records were updated to reduce likelihood of happening again.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/06/2020	NSPS (Part 60)	Compliance	<p>Annual NSPS Report EU-ACTIVECOLL- Failed to perform monthly pressure, oxygen and temperature monitoring at MLC16A01, MLC16B01 and MLC16C04. During the period, monthly monitoring of 3 gas wells was inadvertently missed despite timely review of data by the landfill manager. The facility was relying on a pivot table to review data which had pulled in historic information kept in the same spreadsheet. The issue was corrected to eliminate future error.</p> <p>EU-ACTIVECOLL- failure to perform corrective action for pressure exceedances of MLGW-23 within 5 calendar days due to a misunderstanding that a previously approved positive pressure variance was still in effect. Files were updated to document the variance had expired so the error was not repeated. The well was in compliance during the next monthly reading.</p> <p>11/25/2019 (29 days) Failure to perform corrective action for an O2 exceedance for MLS09-10. though had an O2 variance in place for this well. Only had pressure variance approved. Records were updated to reduce likelihood of happening again.</p>
03/16/2020	ROP Other	Compliance	<p>Semi Annual MACT AAAA/SSM Report (21) SSM events, mainly due to planned/scheduled maintenance to the GCCS in order to mitigate SEM scan exceedances. Q3 had one location with 3 exceedances. A tar wrap and compost was added and compacted the first time, the second and third times compost was added and compaction. A bigger gas system expansion project was completed in Q4 to mitigate.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	ROP Semi 1 Cert	Compliance	<p>EU-ACTIVECOLL- Failed to perform monthly pressure, oxygen and temperature monitoring at MLC16A01, MLC16B01 and MLC16C04. During the period, monthly monitoring of 3 gas wells was inadvertently missed despite timely review of data by the landfill manager. The facility was relying on a pivot table to review data which had pulled in historic information kept in the same spreadsheet. The issue was corrected to eliminate future error.</p> <p>EU-ACTIVECOLL- failure to perform corrective action for pressure exceedances of MLGW-23 within 5 calendar days due to a misunderstanding that a previously approved positive pressure variance was still in effect. Files were updated to document the variance had expired so the error was not repeated. The well was in compliance during the next monthly reading.</p>
09/24/2019	NSPS (Part 60)	Compliance	<p>EU-ACTIVECOLL- Failed to perform monthly pressure, oxygen and temperature monitoring at MLC16A01, MLC16B01 and MLC16C04. During the period, monthly monitoring of 3 gas wells was inadvertently missed despite timely review of data by the landfill manager. The facility was relying on a pivot table to review data which had pulled in historic information kept in the same spreadsheet. The issue was corrected to eliminate future error.</p> <p>EU-ACTIVECOLL- failure to perform corrective action for pressure exceedances of MLGW-23 within 5 calendar days due to a misunderstanding that a previously approved positive pressure variance was still in effect. Files were updated to document the variance had expired so the error was not repeated. The well was in compliance during the next monthly reading.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	MACT (Part 63)	Compliance	<p>SSM Semi Annual Report.</p> <p>(10) events total. Flare malfunctioned a few times due to freezing or need of a new baffle plate. GTE was in operation when flare was down. Started up wells MLC16D08, MLC16C08, MLS 7-8 and MLCO1305. Shutdown a few times to bring new wells online. All SSM events followed the SSM plan and the plan was reviewed, but no revisions were made.</p>
08/22/2019	Other Non ROP	Compliance	<p>SO2 PTE for facility PTE for engines is 25.2 tpy.below significance levels.</p>
06/20/2019	Stack Test	Compliance	<p>NSPS Emission Test Report for digester gas and LFG fired IC engines (EUIENGINE1-2)</p> <p>Below permit limits: NOx=1.0 g/bhp-hr, CO= 4.2 g/bhp-hr VOC= 1.0 g/bhp-hr</p> <p>Engine1 NOx=0.61 g/bhp-hr CO= 2.91 g/bhp-hr VOC=0.1 g/bhp-hr</p> <p>Engine2 NOx=0.68 g/bhp-hr CO=2.70 g/bhp-hr VOC=0.13 g/bhp-hr</p>
05/01/2019	Stack Test Observation	Compliance	<p>NSPS JJJJ testing</p>



Activity Date	Activity Type	Compliance Status	Comments
04/03/2019	ROP Annual Cert	Compliance	<p>No well deviations.</p> <p>GCCS not shutdown for more than 5 days.</p> <p>SEMs  Q1- No exceedances  Q2- (3) monitoring exceedances, near manholes, suspect settling. Repairs complete by 9-12-2018  Q3-(5) exceedances initially. 10-day re-check, 2018-Q3-4 exceedance, corrective action was to remove surface soil and granular bentonite and clay was added at the base of wells. 2nd 10-day re-check, no exceedances. One month after the initial exceedances, SEM showed no exceedances.  Q4-(3) exceedances. Locations 2018-Q4-1 and 2018-Q4-2 had three exceedances documented, required to expand the GCCS within 120 days. Alternative timeline requested due to inclement weather. Granted extension on 3-18-2019. GCCS to be expanded by May 31, 2019.</p>
04/03/2019	ROP SEMI 2 CERT	Compliance	<p>No well deviations.</p> <p>GCCS not shutdown for more than 5 days.</p> <p>SEMs  Q1- No exceedances  Q2- (3) monitoring exceedances, near manholes, suspect settling. Repairs complete by 9-12-2018  Q3-(5) exceedances initially. 10-day re-check, 2018-Q3-4 exceedance, corrective action was to remove surface soil and granular bentonite and clay was added at the base of wells. 2nd 10-day re-check, no exceedances. One month after the initial exceedances, SEM showed no exceedances.  Q4-(3) exceedances. Locations 2018-Q4-1 and 2018-Q4-2 had three exceedances documented, required to expand the GCCS within 120 days. Alternative timeline requested due to inclement weather. Granted extension on 3-18-2019. GCCS to be expanded by May 31, 2019.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/03/2019	MACT (Part 63)	Compliance	<p>SSM Semi Annual Report. (31) events SSM Plan was followed and the GCCS was shut down within 1 hour.</p> <p>SEMs  Q1- No exceedances  Q2- (3) monitoring exceedances, near manholes, suspect settling. Repairs complete by 9-12-2018  Q3-(5) exceedances initially. 10-day re-check, 2018-Q3-4 exceedance, corrective action was to remove surface soil and granular bentonite and clay was added at the base of wells. 2nd 10-day re-check, no exceedances. One month after the initial exceedances, SEM showed no exceedances.  Q4-(3) exceedances. Locations 2018-Q4-1 and 2018-Q4-2 had three exceedances documented, required to expand the GCCS within 120 days. Alternative timeline requested due to inclement weather. Granted extension on 3-18-2019. GCCS to be expanded by May 31, 2019.</p>
04/03/2019	ROP Other	Compliance	2018 Landfill Gas Monitoring Record

Activity Date	Activity Type	Compliance Status	Comments
04/03/2019	NSPS (Part 60)	Compliance	2018 Annual Report
			<p>No well deviations.</p> <p>GCCS not shutdown for more than 5 days.</p> <p>SEMS</p> <p>Q1- No exceedances</p> <p>Q2- (3) monitoring exceedances, near manholes, suspect settling. Repairs complete by 9-12-2018</p> <p>Q3-(5) exceedances initially. 10-day re-check, 2018-Q3-4</p> <p>exceedance; corrective action was to remove surface soil and granular bentonite and clay was added at the base of wells. 2nd 10-day re-check, no exceedances.</p> <p>One month after the Initial exceedances, SEMI showed no exceedances.</p> <p>Q4-(3) exceedances. Locations 2018-Q4-1 and 2018-Q4-2 had three exceedances documented, required to expand the GCCS within 120 days. Alternative timeline requested due to inclement weather. Granted extension on 3-18-2019. GCCS to be expanded by May 31, 2019.</p>
03/14/2019	Other Non ROP	Compliance	SOx PTE. Staff requested SOx PTE based on state wide initiative. Entire facility SOx PTE was 25.2 tons.

Name: 

Date: 9/29/2022

Supervisor:

