

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Oakland Heights Development, Inc.	SRN : N6008
Location : 2350 Brown Road	District : Southeast Michigan
	County : OAKLAND
City : AUBURN HILLS State: MI Zip Code : 48326	Compliance Status : Compliance
Source Class : MAJOR	Staff : Rebecca Loftus
FCE Begin Date : 7/12/14	FCE Completion Date : 2/17/2016
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/17/2016	Scheduled Inspection	Compliance	
02/05/2016	MACT (Part 63)	Compliance	WMRE Treatment System SSM Plant- WMRE provided AQD staff with a copy of the SSM required by Section 2 of ROP No. MI-ROP-N6008-2015. See full Plan in file. The plan is dated September 4, 2014 and has no listed revisions. Reviewed by R. Loftus
11/21/2015	Other Non ROP		Alternative Timeline Request for well 113 and Leachate manhole P1MH; See file for complete request. Reviewed by R. Loftus
11/16/2015	Stack Test	Compliance	Utility Flare Performance Test Report: AQSI conducted a flare stack test on September 28, 2015. According to the report AQSI observed VEs for 0 minutes, 38 seconds with the following gas parameters: Inlet Gas Net Heating Value 18.04 MJ/scm (which calculates to approximately 484 btu/scf), Flare Exhaust Gas Exit Velocity 33.41 ft/sec, Maximum Permitted Velocity 33.41 ft/sec. See full report for details. -Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
09/25/2015	ROP Semi 1 Cert	Compliance	<p>Semi Annual Report, January 1, 2015 – June 30, 2015: For this reporting period, the facility reported (4) deviations. The first deviation was for two wells which had oxygen, pressure, and/or temperature variances. In response, Republic requested alternate timelines/operating values and achieved compliance through well tuning. The second deviation was to report flare downtimes greater than 1 hour in duration. Responses to the downtimes were consistent with their SSM Plan. The third deviation was due to flare flow and/or temperature records not being recorded continuously and/or retained for 5 years. This deviation was previously reported and will have to be reported for 5 years after discovery of the initial exceedance. The fourth was for flare data that was not collected every 15mins on six different dates for an hour or less; this appears to be due to down time associated with power outages. Report reviewed by R. Loftus</p>

Activity Date	Activity Type	Compliance Status	Comments
09/25/2015	NSPS (Part 60)	Compliance	<p>NSPS Report: January 1, 2015 - June 30, 2015; the facility properly documented instances in which wells had temperature, oxygen, and pressure exceedances. In instances in which the exceedance could not be corrected within 15 days, the facility requested alternate operating variances/timelines for Two wells, and brought wells back into compliance through tuning. Table 1 of the NSPS report provides a detailed account of the duration of each wellhead exceedance.</p> <p>Oakland Heights does not have a control bypass; the two enclosed flares serve as control for any gas that is not sent off-site to GM. There were (6) instances in which the flare data recorder was down (ranging from 16-60mins) due to power outages.</p> <p>There were 16 instances during the reporting period in which all the control devices (off-site customer – GM and two flares) were simultaneously not operating for longer than 1 hour in duration. These were documented in Table 3 and appear to be due maintenance activities or an automatic shutdown due to protective system alarm.</p> <p>There were no instances in which the gas collection system was down for more than 5 days. The 1st and 2nd quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane.</p> <p>Oakland Heights did not install any new wells during this period.</p> <p>Report reviewed by R. Loftus.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/25/2015	MACT (Part 63)	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report: From January 1, 2015 - June 30, 2015, there were 31 startup, 9 shutdown, and 23 malfunction events during this reporting period. According to the report, the actions taken in response to these events were consistent with the site's SSM Plan. Table 1 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during the reporting period. No revisions to the SSM Plan were made during the reporting period. Report reviewed by R. Loftus
08/14/2015	Other Non ROP	Compliance	Notification of Excavation/Disturbance Asbestos Containing Waste; this is a duplicate copy of the notification sent to AQD's NESHAP Asbestos Program. As required by the ROP, Republic submitted the notification to the AQD 45 days prior to the excavation. Reviewed by R. Loftus
08/14/2015	Other Non ROP	Compliance	Notification of completion/installation (PTI # 11-15) of EUFLARE 1. As required by PTI 11-15, condition VII.3., Oakland Heights is reporting the start-up date for EUFLARE1. According to the report, construction and programming of the flare was complete on July 28, 2015. Reviewed by R. Loftus
08/06/2015	Other Non ROP		Alternative Timeline Request to return Leachate Cleanout Riser 2 (LCR2) to compliance. See file for complete request. Reviewed by R. Loftus
08/06/2015	Other Non ROP		Alternative Timeline Request for Well 82R. See file for complete request. Reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
06/05/2015	ROP Semi 1 Cert	Compliance	Deviation Report (10 day notification) and Certification for WMRE at Oakland Heights: Waste Management report one deviation at the WMRE Treatment System at Oakland Heights (see section 2 of the ROP). The report indicates that a crack in the below-grade condensate sump flange caused LFG to escape from the gas line for an estimated 2 hours and 5 mins. The pipeline was isolated and repairs were made the following day. The response to the incident occurred in a timely fashion. Report reviewed by R. Loftus
05/28/2015	MAERS	Compliance	MAERS Report: Audit complete; no changes made. See notes in MAERS database for details. Reviewed by R. Loftus
03/27/2015	ROP SEMI 2 CERT	Compliance	Semi-Annual: July 1, 2014 – December 31, 2014; For this reporting period, the facility reported 3 deviations. The first deviation was for four wells which had oxygen, pressure, and/or temperature variances. In response, Republic requested alternate timelines/operating values, replaced a lateral, re-drill a well, and/or achieved compliance through well tuning. The second deviation was to report flare downtimes greater than 1 hour in duration. Responses to the downtimes were consistent with their SSM Plan. The third deviation was due to flare flow and/or temperature records not being recorded continuously and/or retained for 5 years. This deviation was previously reported and will have to be reported for 5 years after discovery of the initial exceedance. Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/27/2015	NSPS (Part 60)	Compliance	<p>NSPS WWW: July 1, 2014 – December 30, 2014; the facility properly documented instances in which wells had temperature, oxygen, and pressure exceedances. In instances in which the exceedance could not be corrected within 15 days, the facility requested alternate operating variances/timelines for several wells, and/or brought wells back into compliance through tuning. Table 1 of the NSPS report provides a detailed account of the duration of each wellhead exceedance.</p> <p>Oakland Heights does not have a control bypass; the two enclosed flares serve as control for any gas that is not sent off-site to GM. There was one instance in which the flare data recorder was down for 28 mins due to maintenance.</p> <p>There were 12 instances during the reporting period in which all the control devices (off-site customer – GM and two flares) were simultaneously not operating for longer than 1 hour in duration. These were documented in Table 3 and appear to be due maintenance activities or a protective system alarm.</p> <p>There were no instances in which the gas collection system was down for more than 5 days. The 3rd and 4th quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane.</p> <p>Oakland Heights installed three replacement vertical wells during this period.</p> <p>Report reviewed by R. Loftus.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/27/2015	MACT (Part 63)	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report: July 1, 2014 – December 30, 2014; there were 27 startup, 14 shutdown, and 13 malfunction events during this reporting period. According to the report, the actions taken in response to these events were consistent with the site's SSM Plan. Table 1 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during the reporting period. No revisions to the SSM Plan were made during the reporting period. Report reviewed by R. Loftus
12/23/2014	ROP Tech Review Notes		2014 ROP Renewal Technical Review Notes
11/21/2014	Other Non ROP		Alternative Timeline Request for wells 13 and 16R; See file for complete request. Reviewed by R. Loftus
09/25/2014	MACT (Part 63)	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report, January 1, 2014 – June 30, 2014: For this reporting period there were 26 start-up events, 7 shutdown events, and 18 malfunction events. The actions taken in response to these events were consistent with the procedures listed in the SSM Plan. Table 1 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during the reporting period. No revisions to the SSM Plan were made during the reporting period. Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
09/25/2014	ROP Semi 1 Cert	Compliance	<p>Semi Annual Report, January 1, 2014 – June 30, 2014: For this reporting period, the facility reported 3 deviations. The first deviation was for five wells which had oxygen, pressure, and or temperature variances. In response, Republic requested to decommission some wells, requested alternate timelines/operating values, and/or achieved compliance through well tuning. The second deviation was to report flare downtimes greater than 1 hour in duration. Responses to the downtimes were consistent with their SSM Plan. The third deviation was due to flare flow and/or temperature records not being recorded continuously and/or retained for 5 years. This deviation was previously reported and will have to be reported for 5 years after discovery of the initial exceedance. Report reviewed by R. Loftus</p>

Activity Date	Activity Type	Compliance Status	Comments
09/25/2014	NSPS (Part 60)	Compliance	<p>Semi Annual NSPS Report, January 1, 2014 – June 30, 2014: The facility properly documented instances in which wells had temperature, oxygen, and pressure exceedances. In instances in which the exceedance could not be corrected within 15 days, the facility requested higher temperature operating variances for several wells, alternative timelines for other wells, and that certain wells be decommissioned. Tables 1 and 2 of the NSPS report provide a detailed account of the duration of each wellhead exceedance. There were 16 instances during the reporting period in which all the control devices (off-site customer – GM, two flares) were simultaneously not operating for longer than 1 hour in duration. These were documented in Table 3 and appear to be due maintenance activities or a protective system alarm; the longest down time (73 hours) was due to a blower failure that required repairs before restarting the system. There were no instances in which the gas collection system was down for more than 5 days. The 1st and 2nd quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane. Report reviewed by R. Loftus.</p>

Name: Rebecca Loftus Date: 3/16/16

Supervisor: CJE