

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 : Kerry Kelly
FCE Begin Date : 3/1/2016	FCE Completion Date : 8/14/2017
Comments : Based on information gathered during the inspection and records reviewed, Oakland Heights and WMRE appear to be in compliance with the evaluated applicable Federal Clean Air Act, Michigan's Air Pollution Control Rules, and the conditions of MI-ROP-N6008	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/14/2017	Scheduled Inspection	Compliance	FY 2017 scheduled inspection and FCE. Based on information gathered during the inspection and records reviewed, Oakland Heights and WMRE appear to be in compliance with the evaluated applicable Federal Clean Air Act, Michigan's Air Pollution Control Rules, and the conditions of MI-ROP-N6008-2015, and PTI No. 117-16.
07/12/2017	ROP Annual Cert	Compliance	For 2016, the facility reported total of six deviations (see the semi-annual reports for details).
07/12/2017	ROP SEMI 2 CERT	Compliance	Semi 2 Deviations: July 1, 2016 – December 31, 2016; for this reporting period, the facility reported three deviations. The first deviation was for a well which had oxygen, pressure, and/or temperature variances that could not be corrected within 15 days. In response, Oakland Heights requested a higher operating value. The second deviation was for flare data that was not collected every 15mins on three different instances; the longest down time (3 hours 56 minutes) was due to "electrical maintenance". The third deviation was to report flare downtimes greater than 1 hour in duration.

Activity Date	Activity Type	Compliance Status	Comments
07/12/2017	ROP Annual Cert	Compliance	Annual Certification, received on 3/14/17: For 2016, WMRE reported total of two deviations. See the individual semi-annual reports for details.
07/12/2017	ROP SEMI 2 CERT	Compliance	EUTREATMENTSYS, NSPS WWW Report for July 1, 2016 – December 31, 2016, received 3/15/16: WMRE reported 11 instances during the reporting period in which the Treatment System was shut down for longer than 1 hour in duration. Eight of the eleven instances when the treatment system was not operating were reportedly due to activities occurring on the landfill side (Oakland Heights, Inc.); i.e. KOP high alarm, flare maintenance, blower maintenance/fault. The other three instances were reportedly due to power outages. Since the treatment system is only used when sending gas off-site; it appears LFG was addressed by Oakland Heights' during most of the treatment system outages.
07/12/2017	ROP Other	Compliance	SSM Plan Semi-annual Report for July 1, 2016 – December 31, 2016. Upon review of 40 CFR 63.10 (d)(5)(I) and the report; it appears the includes the information required in 40 CFR 63.10(d)(5)(I). According to the report, 14 start-up, 7 shut-down, and 7 malfunction events occurred during the reporting period and actions taken for these SSM events were consistent with the procedures listed in the SSM Plan.
07/12/2017	ROP R215 Notification	Compliance	Rule 215 request to change Responsible Official to Farid Abuchaibe. The preceding RO was Alan Devoti.
07/11/2017	MACT (Part 63)	Compliance	SSM for July 1, 2016 – December 31, 2016. Upon review of 40 CFR 63.10 (d)(5) and the report; it appears the includes the information required in 40 CFR 63.10(d)(5). According to the report, 19 start-up, 7 shut-down, and 9 malfunction events occurred during the reporting period and actions taken for these SSM events were consistent with the procedures listed in the SSM Plan.

Activity Date	Activity Type	Compliance Status	Comments
05/31/2017	MAERS	Compliance	MAERS Report Submission. Audit complete: I corrected/changed the design capacity for EUFLARE1, with approval from Andy Karg, from 90 mmbtu/hr to 157 mmbtu/hr. I also changed the emission factor basis for NOx and CO for EUFLARE1 to EPA Method and entered the emission factors supplied by Mr. Karg on the attachments provided. The SO2 and NMOC/VOC emission factor basis for EUFLARE1 were changed to mass balance based on the information provided in Mr. Karg's spreadsheet.
03/28/2017	NSPS (Part 60)	Compliance	Alternative timeline request for well OAKL0010 was received via email on October 26, 2016. The well was experiencing elevated oxygen beginning October 12, 2016 and a compliant oxygen reading was not achieved within 15 days. A letter approving the alternative timeline for well OAKL0010 was sent via email on October 28, 2016.
03/02/2017	NSPS (Part 60)	Compliance	Alternative timeline request for well OAKL0010 was received via email on February 28, 2017. The well was experiencing elevated oxygen beginning February 15, 2017 and a compliant oxygen reading was not achieved within 15 days. A letter approving the alternative timeline for well OAKL0010 was sent via email on March 2, 2017.
02/14/2017	Stack Test Observation	Compliance	Testing required per PTI 117-16 SC V.4.
02/08/2017	ROP Other	Compliance	Notification required by 40 CFR 61.154(j) for potential to disturb asbestos-containing wastes. The notification appears to contain the information required in 40 CFR 61.154(j) and MI-ROP-N6008-2015.

11/15/2016	NSPS (Part 60)	Compliance	<p>Semi-Annual NSPS WWW Report: January 1, 2016 – June 30, 2016; the facility properly documented 26 collectors that had temperature, oxygen, and/or pressure exceedances; according to the report, these wells were brought back into compliance (See Table 1). Oakland Heights documented 11 collectors in which the exceedance could not be corrected within 15 days; the facility reported requesting alternate timelines and bringing the wells back into compliance through additional tuning (See Table 2).</p> <p>There were 2 instances reported in which the flare data recorder for EUFLARE was down (ranging from 18 mins to 38 mins). According to the report, "most instances of data loss are typically attributable to power outages or electronic glitches. The Environmental Manager, Robb Moore, provided a more descriptive explanation for the flare down time during a November 14, 2017 phone call with AQD. During the call Mr. Moore stated the March 17, 2016 recorder down time due to replacement and calibration of a new flow meter. The May 4, 2016 recorder down time, according to Mr. Moore, was likely data that was missed while the technician was downloading data.</p> <p>There were 22 instances during the reporting period in which all the control devices (off-site customer (GM) and flare) were simultaneously not operating for longer than 1 hour in duration. These were documented in Table 3; these instances appear primarily due to maintenance activities, automatic shutdown, or equipment malfunction. It is reported that there were no instances in which the gas collection system was down for more than 5 days.</p> <p>The 1st and 2nd quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane according to the report.</p>
------------	----------------	------------	---

11/15/2016	NSPS (Part 60)	Compliance	Oakland Heights reported that there were no new wells installed during the reporting period.
11/15/2016	ROP Semi 1 Cert	Compliance	For January 1, 2016 through June 30, 2016, the facility reported total of 3 deviations (see the semi-annual reports for details). Oakland Heights' responses to each deviation appear to have occurred in a timely fashion and were consistent with their SSM Plan.
11/14/2016	MACT (Part 63)	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report: From January 1, 2016 – June 30, 2016, for the GCCS (including EUFLARE1) there were 44 startup, 10 shutdown, and 34 malfunction events during this reporting period. On May 12, 2016 it was reported the flare was "automatically shutdown due to protective systems" for 13.7 hours. In a phone call on November 14, 2016 Mr. Moore explained there were surges on May 12, 2016, the blower was shut down, and the system shut down and evaluated. Though the description in the SSM report was vague, Mr. Moore's description is acceptable. More specific descriptions will be requested for the SSM reports. 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 (see full report in file) -K.Kelly

Activity Date	Activity Type	Compliance Status	Comments
11/07/2016	NSPS (Part 60)	Compliance	EUTREATMENTSYS, NSPS WWW Report for January 1, 201 – June 30, 2016, received 9/14/16: WMRE reported (23) instances during the reporting period in which the Treatment System was shut down for longer than 1 hour in duration. In most of the instances, the treatment system was not operating due to activities occurring on the landfill side (Republic); i.e. flare down, blower station down, compressor down, or maintenance.
10/28/2016	NSPS (Part 60)	Compliance	
10/20/2016	ROP Semi 1 Cert	Compliance	Semi-annual Certification, received on 9/14/16: For 2015, WMRE reported one deviation. See the semi-annual report for details.
10/20/2016	MACT (Part 63)	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report: From January 1, 2016 - June 30, 2016. EUTREATMENTSYS, SSM for January 1, 2016 – June 30, 2016, received on 9/14/16: For this reporting period there were 23 start-up events, 5 shutdown events, and 18 malfunction events. Attachment #2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during this reporting period. WMRE reported, the actions taken in response to these events were consistent with the procedures listed in their SSM Plan and no revisions to the SSM Plan were made.
10/07/2016	Other Non ROP		Oxygen HOV Request for Leachate cleanout Rise 2 (LCR2) . - See 'NSPS Request File' for details. Reviewed by R. Loftus
09/12/2016	Other Non ROP		Alternative Timeline Request for Well 18R.- See 'NSPS Request File' for details. Reviewed by R. Loftus
09/12/2016	Other Non ROP		Alternative Timeline Request for Wells 17, 24 9R, 16R, 18R, 21R, 35R, 93A. - See 'NSPS Request File' for details. Reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
05/27/2016	MAERS	Compliance	MAERS Report received 2/29/16 (the certification was received 3/9/16). Audit complete; no changes made. Reviewed by R. Loftus
04/29/2016	ROP R215 Notification		Change of Responsible Official - Reviewed by R. Loftus Alan Devoti, General Manager 5011 S. Liley Road Canton, MI 48188 734-348-5151 ADevoti@republicservices.com
04/26/2016	Other Non ROP		Alternative Timeline Request for Wells 13A and 15A (an email notification for these wells was received on 3/3/2016) Summary of Request: Well 13A had exhibited positive pressure for 30 days between 2/8/16 and 3/9/16 and Well 15A has exhibited positive pressure and elevated oxygen since 2/8/16. On March 21, 2016, Oakland Heights inspected the well laterals with a camera and noted both laterals had bellied and were watered in; contributing to a large decrease in the available vacuum at the wells. Corrective actions will take place during the planned construction event on June 30, 2016. Oakland Heights is requesting an alternate timeline (June 30, 2016) to replace the laterals and restore vacuum to these wells. See NSPS file for details. UPDATED: Oakland Heights requested an extension for the lateral construction; extended to August 1, 2016. See 'NSPS Request File' for details. Reviewed by R. Loftus Reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/28/2016	NSPS (Part 60)	Compliance	EUTREATMENTSYS, NSPS WWW Report for July 1, 2015 – December 31, 2015, received 3/15/16: WMRE reported (42) instances during the reporting period in which the Treatment System was shut down for longer than 1 hour in duration. In most of the instances, the treatment system was not operating due to activities occurring on the landfill side (Republic); i.e. GCCS construction, flare down, blower station down. Since the treatment system is only used when sending gas off-site; it appears LFG was sent to Republics flare in the majority of these instances. Report reviewed by R. Loftus
03/28/2016	ROP SEMI 2 CERT	Compliance	EUTREATMENTSYS, Semi-Annual Deviation Report for June 30, 2015 – December 31, 2015, received 3/15/16: WMRE did not submit the semi-annual reports for January 1 - June 30, 2015 for their portion of the ROP (Section 2). A violation notice was issued to WMRE on February 11, 2015, and the AQD received a response to the letter and the reports on March 2, 2016. WMRE reported the missed reports as a deviation. No further action will be taken by the AQD at this time as a violation notice was already issued for this matter. Report reviewed by R. Loftus
03/28/2016	ROP Annual Cert	Compliance	Annual Certification, received on 3/15/16: For 2015, WMRE reported total of (2) deviations. See the individual semi-annual reports for details. Reports reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/28/2016	MACT (Part 63)	Compliance	EUTREATMENTSYS, SSM for July 1, 2015 – December 31, 2015, received on 3/15/16: For this reporting period there were 42 start-up events, 19 shutdown events, and 23 malfunction events. Attachment #2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during this reporting period. WMRE reported, the actions taken in response to these events were consistent with the procedures listed in their SSM Plan and no revisions to the SSM Plan were made. Report reviewed by R. Loftus.
03/28/2016	Other Non ROP	Compliance	Notification of Excavation/Disturbance Asbestos Containing Waste As required by their permit and the Asbestos NESHAP, Oakland Heights submitted a notification for potential disturbance of asbestos waste starting May 7, 2016 and ending August 31, 2016. As discussed during the on-site inspection, Oakland Heights no longer accepts friable asbestos waste, however historical placement of asbestos containing waste is unknown; therefore Oakland Heights submits a notification for every landfill/landfill gas collection construction project. A copy of the notification was appropriately addressed to the Asbestos Program in Lansing. Reviewed by R. Loftus
03/28/2016	ROP Annual Cert	Compliance	For 2015, the facility reported total of (8) deviations (see the semi-annual reports for details). Oakland Heights' responses to each deviation appear to have occurred in a timely fashion and were consistent with their SSM Plan. Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/28/2016	ROP SEMI 2 CERT	Compliance	<p>Semi 2 Deviations: July 1, 2015 – December 31, 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 that could not be corrected within 15 days. In response, Oakland Heights requested alternate timelines 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 (4) different instances; the longest down time was due to new construction of EUFLARE1 and the remainder appear to be due to down time associated with maintenance activities/system alarms. Report reviewed by R. Loftus</p>

03/28/2016	NSPS (Part 60)	Compliance	<p>Semi-Annual NSPS WWW Report: July 1, 2015 – December 31, 2015; the facility properly documented (35) collectors that had temperature, oxygen, and/or pressure exceedances; these wells were brought back into compliance through tuning (See Table 1). Oakland Heights document (2) collectors in which the exceedance could not be corrected within 15 days; the facility requested alternate timelines and brought the wells back into compliance through additional tuning (See Table 2).</p> <p>On July 28, 2015, Oakland Heights constructed a new utility flare (EUFLARE) to replace the two enclosed flares. The flare does not have a bypass and serves as control for any gas that is not sent off-site to GM. There were (4) instances in which the flare data recorder was down (ranging from 20mins to 5days) The 5 day down time, and other July events were due to the new flare construction (the enclosed flares were removed after the new flare was installed); the remaining flare down time was due to a power outage.</p> <p>There were 42 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; (12) of the instances were due to flare/blower station construction activities and the remainder appear to be due maintenance activities or an automatic shutdown due to protective system alarm. There were no instances in which the gas collection system was down for more than 5 days.</p> <p>The 3rd and 4th quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane.</p> <p>Oakland Heights installed (5) replacement vertical gas collection wells and (6) new vertical gas</p>
------------	----------------	------------	--

03/28/2016	NSPS (Part 60)	Compliance	collection wells. The following wells were activated during this reporting period: OAKL004A, OAKL007A, OAKL008A, OAKL084A, OAKL093A, OAKL0097, OAKL0098, OAKL0099, OAKL0110, OAKL0114, OAKL0015 Report reviewed by R. Loftus.
03/28/2016	MACT (Part 63)	Compliance	Semi-Annual Startup, Shutdown, and Malfunction Report, received 3/9/16: From July 1, 2015 – December 31, 2015, for the GCCS (including EUFLARE1) there were 121 startup, 84 shutdown, and 31 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 (see full report in file) Report reviewed by R. Loftus
03/22/2016	ROP R215 Notification	Compliance	Rule 216(2) Minor Modification Oakland Heights submitted a M-001 application to incorporate the terms and conditions of PTI 11-15 (EUFLARE) into ROP No. MI-ROP -N6008-2015 and remove the old flares (EUPERENNIALFLARE and EULFG&EFLARE in FGENCLOSED FLARES). Based on my review of the application and the inspection conducted on 2/17/16, Oakland Heights appears to be in compliance with the terms and conditions of PTI No 11-15 and the AQD should proceed with incorporating the permit into the ROP. Reviewed by R. Loftus
03/11/2016	ROP Other	Compliance	MAERS ROP Certification; received on time on 3/9/16. Reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/02/2016	ROP Semi 1 Cert	Compliance	<p>Note: WMRE did not submit the semi-annual reports for January 1 - June 30, 2015 for their portion of the ROP Section 2(a deviation was reported on 5/29/16 for EUTREATMENTSYS for a release in LFG caused by a crack in a below grade flange). A violation notice was issued to WMRE for the missing reports on February 11, 2015, and the AQD received a response to the letter and the reports on March 2, 2016.</p> <p>EUTREATMENTSYS, Semi-Annual Deviation Report for January 1, 2015 – June 30, 2015: For this reporting period, WMRE reported one deviation. The deviation was for LFG venting that occurred for 2 hours from the pipeline due to a cracked condensate pump flange cover. WMRE and Oakland Heights isolated the LFG pipeline and replaced the flange cover. WMRE noted all sump flange covers were upgraded to stainless steel covers. Report reviewed by R. Loftus</p>

Activity Date	Activity Type	Compliance Status	Comments
03/02/2016	MACT (Part 63)	Compliance	<p>Startup, Shutdown, and Malfunction Report, January 1, 2015 – June 30, 2015:</p> <p>Note: WMRE did not submit the semi-annual reports for January 1 - June 30, 2015 for their portion of the ROP (Section 2). A violation notice was issued to WMRE on February 11, 2015, and the AQD received a response to the letter and the reports on March 2, 2016.</p> <p>EUTREATMENTSYS, SSM for January 1, 2015 – June 30, 2015: For this reporting period there were 8 start-up events, 4 shutdown events, and 5 malfunction events. Attachment #2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during this reporting period. The actions taken in response to these events were consistent with the procedures listed in the SSM Plan and no revisions to the SSM Plan were made. Report reviewed by R. Loftus.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/02/2016	NSPS (Part 60)	Compliance	<p>Note: WMRE did not submit the semi-annual reports for January 1 - June 30, 2015 for their portion of the ROP (Section 2). A violation notice was issued to WMRE on February 11, 2015, and the AQD received a response to the letter and the reports on March 2, 2016.</p> <p>EUTREATMENTSYS, NSPS Report for January 1, 2015 – June 30, 2015 WMRE reported (5) instances during the reporting period in which the Treatment System was shut down for longer than 1 hour in duration. In (4) of instances, the treatment system was not operating due to activities occurring on the landfill side (Republic). Another instance was reported in May 2015: WMRE reported a time of 2 hours and 5 mins when LFG was vented into the atmosphere and a total down time of 15.3 hours. The LFG pipeline was isolated and a cracked flange cover on a below grade condensate pump was replaced. WMRE properly reported this event when it occurred. Report reviewed by R. Loftus</p>

Name: _____

Date: _____

Supervisor: SK

