

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> SMITHS CREEK LANDFILL	<b>SRN :</b> N6207
<b>Location :</b> 6779 SMITHS CREEK ROAD	<b>District :</b> Southeast Michigan
	<b>County :</b> SAINT CLAIR
<b>City :</b> SMITHS CREEK <b>State:</b> MI <b>Zip Code :</b> 48074	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Rebecca Loftus
<b>FCE Begin Date :</b> 9/27/14	<b>FCE Completion Date :</b> 8/18/2015
<b>Comments :</b> See also SRN: P0262, Blue Water Renewables Landfill Gas to Energy Plant. These are one stationary source	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
08/18/2015	Scheduled Inspection	Compliance	
06/11/2015	MAERS	Compliance	MAERS Report: Audit Complete; See review notes in MAERS database. Reviewed by R. Loftus
03/31/2015	ROP Other	Compliance	MAERS ROP Certification; certification received on time. Reviewed by R. Loftus
03/31/2015	MACT (Part 63)	Compliance	SSM Semi-Annual, July, 2014 – December 31, 2014: For this reporting period there were 4 SSM events. Two of the events were the result of data logger malfunctions on the blower/fuel skid and solar flare #5. The other two events were related to shutdowns of the collection system as a result if the gas to energy facility being forced offline by the utility company. See the provided SSM record keeping forms in the file for details. 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 during this reporting period. Report reviewed by R. Loftus.

Activity Date	Activity Type	Compliance Status	Comments
03/31/2015	ROP SEMI 2 CERT	Compliance	July 1, 2014 – December 31, 2014: For this reporting period, the facility reported four deviations. The deviations included solar flare #5 data logger downtime and wells which had oxygen and/or pressure variances. In response, Smiths Creek added a QA/QC check of well data recordings, fixed the data logger, and tuned the wells to return them to compliance. Report reviewed by R. Loftus
03/31/2015	ROP Annual Cert	Compliance	For 2014, the facility reported a total of 16 deviations (see the semi-annual reports for details). In response to the deviations, Smiths Creek requested alternate timelines/operating values, fixed data loggers, and tuned wells to return them to compliance. Smiths Creek's responses to each deviation occurred in a timely fashion and were consistent with their SSM Plan. Report reviewed by R. Loftus

03/31/2015	NSPS (Part 60)	Compliance	<p>NSPS Annual Report: The NSPS Report was received on time 3/13/15, and covers the Semi-Annual (July 1, 2014 – December, 2014) and Annual (2014) data: During this reporting period the GCCS consisted of 83 landfill gas extraction wells/lines and 6 passive solar flares located in the closed section of the landfill. Of the 83 wells, 15 have been permanently decommissioned with appropriate notification to the MDEQ. Records of all decommissioned wells are properly documented.</p> <p>The facility reported not collecting data for two wells in February because of frozen terrain and eight wells in June due to unsaved data. To ensure missed data does not happen in the future the well tech and consultants will review all data at the end of the month to ensure each well's data has been saved.</p> <p>The facility properly documented instances in which wells oxygen (8 instances), pressure (12 instances), and/or temperatures (zero instances) were exceeded. For each well, adjustments and additional readings were made to show compliance with the NSPS parameters. For one well, SCLGW-02, an alternate timeline request was made in order to bring the well back into compliance.</p> <p>Other ROP deviations: There was one malfunction of the hour meter on the scale house emergency generator. For 2014 the engine was only operated for 20mins/week for testing. The meter was fixed on August 31, 2014</p> <p>There were 12 SSM events but the SSM Plan was followed and there were no instances during the reporting period in which all the control devices (Treatment System, flares, and a LF Gas to Energy Plant owned by Blue Water Renewables) were simultaneously not operating for longer than 1 hour in duration.</p>
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03/31/2015	NSPS (Part 60)	Compliance	<p>There were no instances in which the gas collection system was down for more than 5 days.</p> <p>The 1st, 2nd, 3rd, and 4th quarterly scans showed no locations at the landfill that exceeded 500ppm methane above background.</p> <p>No new wells or collection system was added during this reporting period.</p> <p>Report reviewed by R. Loftus.</p>
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Name: Rebecca J. Hill Date: 9/25/15 Supervisor: CJE  
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