

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Citizens Disposal, Inc.	SRN : N5991
Location : 2361 W. Grand Blanc Rd.	District : Lansing
	County : GENESEE
City : GRAND BLANC State: MI Zip Code : 48439	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Julie Brunner
FCE Begin Date : 7/6/2021	FCE Completion Date : 7/6/2022
Comments : On-going non-compliance due to increase in sulfur content of the landfill gas resulting in violations of permit limits and Rule 201.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/22/2022	On-site Inspection	Non Compliance	Performed a scheduled inspection to determine compliance with ROP No. MI-ROP-N5991-2016 and as part of an FCE. Ongoing violation of Rule 201 due to increase in sulfur content of the landfill gas.
03/22/2022	ROP Annual Cert	Non Compliance	ROP No. MI-ROP-N5991-2016. Annual Compliance Cert. ROP No. MI-ROP-N5991-2016, Section 2. Responsible Official - Rocky Tondo, NA Head of Project Delivery and Tech Services. On-going violation of hourly SOx emission limit for EUENGINE6 & 7. See Semi 1 & 2

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart ZZZZ Annual Report for ROP No. MI-ROP-N5991-2016.EDGB engines use only landfill gas for electricity generation. No other fuel source is used to generate electricity in these engines. The fuel for each CAT 3520 (2) engines averaged between 476 and 551 standard cubic feet per minute at 49 percent methane. The CAT 3516 (5) engines averaged between 240 and 307 standard cubic feet per minute at 49 percent methane. The engines were operated in accordance with the operating limits provided in the permit and no issues were encountered in operating the fuel flow meters. Data recorder failed to record kilowatt output and fuel flow for a total of 12.9 hours during the reporting period.
03/22/2022	MACT (Part 63)	Compliance	2nd SEMI ROP No. MI-ROP-N5991-2016. EDL Plant. Startup, Shutdown and Malfunction (SSM) report, 40 CFR 63, Subpart AAAA Treatment system monitoring plan report. Responsible Official - Rocky Tondo. SSM report - 11 startups, 9 shutdowns, and 2 malfunctions the longest being 6.2 hours due to loss of power with procedures taken consistent with the SSM plan.
03/22/2022	ROP R215 Notification	Compliance	Rocky Tondo, North America Head of Project Delivery and Technical Services is the new RO.
03/22/2022	ROP SEMI 2 CERT	Non Compliance	2nd SEMI ROP No. MI-ROP-N5991-2016. EDL Plant. 40 CFR 62, Subpart 000, & 40 CFR 63, Subpart AAAA. Responsible Official - Rocky Tondo. On-going non-compliance with SO2 emission limit on EUENGINE6 & 7. Deviations include 2 instances when kW production and LFG flow were not continuously monitored & recorded for EUENGINE1-7; EUTREATMENTSYS - 19 times the treatment system was down the longest which was 29.5 for utility upgrade and 7 times the treatment system was down for longer than 1 hour the longest was No venting of gas.
03/22/2022	MAERS	Compliance	MAERS cert. Audited

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	ROP Annual Cert	Compliance	Annual ROP Report - Federal Plan, Subpart OOO (effective 6/21/2021) - ROP No. MI-ROP-N5991-2016. RO - Richard Rolf
03/21/2022	MACT (Part 63)	Compliance	2nd SEMI ROP No. MI-ROP-N5991-2016. Startup, Shutdown and Malfunction (SSM) report. Resp. Official, Richard Rolf. 50 start-ups, 59 shutdowns, and 3 malfunction events were reported. One (1) malfunction event for the Zink Flare exceeded one (1) hour in duration; 93.40 hours.
03/21/2022	ROP SEMI 2 CERT	Compliance	Second 2021 Semi-Annual Deviation Report and Semi Annual Compliance Cert. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 60, Subpart WWW, 40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), EUACTIVECOLL - Variance requests for an alternative timelines to correct exceedances in oxygen and positive pressure in 2 wells. Installed 2 replacement vertical wells and 1 horizontal collector. EUGROFFLARE and EUZINKFLARE - 4 instances of where flare flow was not recorded every 15 minutes due to malfunction or maintenance. There was 2 times during the reporting period when electricity generation and back-up flares (controls) were not in operation for more than 1-hour. EULANDFILL - There were 6 locations that initially exceeded 500 ppm of methane in the 3rd and 4th quarter scans.
03/21/2022	MAERS	Compliance	MAERS cert. Audited
02/17/2022	ROP R215 Notification	Compliance	MI-ROP-N5991-2016. Section 2 - EDL, RO - Rocky Tondo; Rule 215(3) NOC: 40 CFR Part 63, Subpart AAAA Opt-In

Activity Date	Activity Type	Compliance Status	Comments
01/18/2022	Stack Test	Compliance	Stack test report for performance testing of EGL landfill gas fueled engines EUENGINE6 and EUENGINE7 as required by ROP No. MI-ROP-N5991-2016 and 40 CFR Part 60 Subpart JJJJ. Dan Zimmerman - Responsible Official. Pollutants tested were NOx, CO, and VOC . The test report indicates that the results are in compliance for emissions of NOx, CO, and VOC.
10/12/2021	ROP R215 Notification	Compliance	MI-ROP-N5991-2016, RO - Richard Rolf; Rule 215(3) NOC: 40 CFR Part 63, Subpart AAAA Opt-In
09/24/2021	ROP Semi 1 Cert	Compliance	Semi Annual Compliance Cert. MI-ROP-N5991-2016. Richard Rolf, Responsible Official for landfill, flares and collection system. (40 CFR 60, Subpart WWW, 40 CFR 62, Subpart OOO, 40 CFR 63 Subpart AAAA), EUACTIVECOLL - Variance requests for an alternative timelines to correct exceedances in oxygen and positive pressure in 8 wells. Installed 7 replacement vertical wells and 1 horizontal collector. EUGROFFLARE and EUZINKFLARE - 3 instances of where flare flow was not recorded every 15 minutes due to malfunction. There was 6 times during the reporting period when electricity generation and back-up flares (controls) were not in operation for more than 1-hour. Per 40 CFR 62.16720(e), there were 2 periods with all control devices and/or the gas collection system was down after 6/21/2021 (greater than 1 hour). EULANDFILL - There was no locations that initially exceeded 500 ppm of methane in the 1st and 2nd quarter scans.

Activity Date	Activity Type	Compliance Status	Comments
09/22/2021	MACT (Part 63)	Compliance	1st SEMI ROP No. MI-ROP-N5991-2016. Startup, Shutdown and Malfunction (SSM) report. Responsible Official - Dan Zimmerman, Dir N.A. HSE & Compliance. EDL Plant. SSM report - 40 CFR 63, Subpart AAAA. 7 startups, 7 shutdowns, and 4 malfunctions the longest being 4.33 hours due to loss of communication for the continuous monitoring system with procedures taken consistent with the SSM plan. *Hard copy received 9-17-21*
09/22/2021	ROP Semi 1 Cert	Non Compliance	1st 2021 Semi-annual ROP No. MI-ROP-N5991-2016. Treatment and Deviation Report. EDL Plant. Dan Zimmerman, Dir N.A. HSE & Compliance. On-going non-compliance with SO2 emission limit on EUENGINE6 & 7. Deviations also include 5 instances when kW production and LFG flow were not continuously monitored & recorded for EUENGINE6 & 7; Per 40 CFR 60.756(d) 2 times the treatment system was down for less than 2 hours and 5 times the treatment system was down for longer than 1 hour.
07/15/2021	Other	Compliance	An alternative timeline request until August 20, 2021 for wells CITCW163 and 164 at Citizens Disposal to address the positive pressure was approved. The wells have exhibited positive pressure since 6/30/2021. Request dated 7/14/2021 is within the 15-day requirement and 6-months of well data was included.

Name: Julie L. Brunner

Date: 7/6/2022

Supervisor: *BW*