

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

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| Facility : Tri-City RDF | SRN : N6007 |
| Location : 426 N. Ruth Rd. | District : Saginaw Bay |
| | County : SANILAC |
| City : CARSONVILLE State: MI Zip Code : 48419 | Compliance Status : Compliance |
| Source Class : MAJOR | Staff : Gina McCann |
| FCE Begin Date : 3/24/2015 | FCE Completion Date : 4/20/2017 |
| Comments : FCE from 3/24/2015 to 4/20/2017 | |

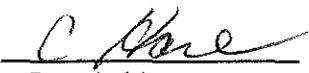
List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|--|
| 04/13/2017 | ROP Annual Cert | Compliance | Wells 25 and 33R positive pressure for 89 days. Pinched lines. ATR to abandon approved and wells were abandoned 2-29-17 and 25R and 33R2 were installed. Flare not operational >1 hr. Not a deviation, but reportable. 18R exceedance overlooked. VN wrote. Corrective action add another collector HZ005. |
| 04/13/2017 | ROP SEMI 2 CERT | Compliance | 18R exceedance overlooked. VN wrote. Corrective action add another collector HZ005. Flare not operational >1 hr. not a deviation, but reportable. |
| 04/13/2017 | NSPS (Part 60) | Compliance | Semi Annual NSPS Report. Wells 25 and 33R positive pressure for 89 days. Pinched lines. ATR to abandon approved and wells were abandoned 2-29-17 and 25R and 33R2 were installed. Flare not operational >1 hr, 4 times. Not a deviation, but reportable. 18R exceedance overlooked. VN wrote. Corrective action add another collector HZ005. |
| 04/13/2017 | MAERS | Compliance | |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------------|-------------------|---|
| 04/13/2017 | MACT (Part 63) | Compliance | MACT AAAA, Semi Annual SSM Report. (23) Startup events. (35) Shutdown events. (0) Malfunctions. All consistent with the SSM Plan. No revisions. |
| 04/06/2017 | Scheduled Inspection | Compliance | Scheduled inspection of MI-ROP-N6007-2012. |
| 10/07/2016 | Malfunction Abatement Plan | Compliance | Flare MAP |
| 10/07/2016 | ROP Semi 1 Cert | Compliance | Well 25 and 33R positive pressure for >15 days, ACT approved on 2/5/16. EW 18R O2 >5% for >15 days, ACT request 9/6/16 denied and VN sent-request was 224 days after initial exceedance. Flare down for (16.3 hrs) on 4/10/16, (3.3 hrs) on 4/15/16, (5.2 hrs) on 4/25/2016 and (1.2 hrs) on 6/16/2016 all due to VFD Over-braking, corrective action re-started. |
| 10/07/2016 | NSPS (Part 60) | Compliance | Well 25 and 33R positive pressure for >15 days, ACT approved on 2/5/16. EW 18R O2 >5% for >15 days, ACT request 9/6/16 denied and VN sent-request was 224 days after initial exceedance. Flare down for (16.3 hrs) on 4/10/16, (3.3 hrs) on 4/15/16, (5.2 hrs) on 4/25/2016 and (1.2 hrs) on 6/16/2016 all due to VFD Over-braking, corrective action re-started. |
| 10/07/2016 | MACT (Part 63) | Compliance | Semi-Annual SSM Plan Report. (8) GCCS startup events, (8) GCCS shutdown events and (0) malfunction events all consistent with SSM plan. No revisions were made to the SSM Plan. |
| 07/20/2016 | Meeting Notes | Compliance | Update on GCCS expansion in lieu of alternative timeline for wells 33R and 25R. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|---|
| 03/25/2016 | NSPS (Part 60) | Compliance | Semi annual NSPS report. Wells 25 and 33R >15 day exceedances, discussed and approved in letter dated 2/5/2016. Pinched laterals will be replacing by July 31, 2016. Flare not operational >1 hour, reportable, but not a deviation. 7 instances- 7/2/15 (4.5 hrs) flame failure triggered automatic shutdown; 7/15/2015 (2.6 hrs) Maintenance-troubleshooting flare; 7/24/2015 (7.3 hrs) PLC faulted and flare shutdown; 7/25/2016 (3.2 hrs) flame failure triggered automatic shutdown; 8/02/2015 (1.1 hrs) flame failure triggered automatic shutdown; 11/06/2015 (5.8 hrs) software maintenance; 11/21/2015 (4.4 hrs) Power outage. |
| 03/25/2016 | ROP SEMI 2 CERT | Compliance | Wells 25 and 33R >15 day exceedances, discussed and approved in letter dated 2/5/2016. Pinched laterals will be replacing by July 31, 2016. |
| 03/25/2016 | NESHAP (Part 61) | Compliance | Semi annual SSM report and NSPS WWW reports submitted to include MACT AAAA requirement. See comments under NSPS (3/10/2016) for deviations, etc. SSM report- (14) GCCS startup events, consistent with plan; (14) GCCS shutdown events, consistent with plan; (0) GCCS malfunctions; No revisions to plan. |
| 03/25/2016 | ROP Annual Cert | Compliance | Wells 25 and 33R >15 day exceedances, discussed and approved in letter dated 2/5/2016. Pinched laterals will be replacing by July 31, 2016. |
| 03/02/2016 | MAERS | Compliance | MAERS submittal |
| 02/26/2016 | ROP Other | Compliance | Utility Flare Test Report |
| 02/03/2016 | Telephone Notes | Unknown | Alternative timeline discussion on wells 33R and EW 25. |
| 11/03/2015 | Stack Test Observation | Unknown | Stack test on new flare. |
| 10/15/2015 | NSPS (Part 60) | Compliance | Semi annual NSPS. (4) wells displayed O2, pressure, or temperature exceedances-corrected w/in 15 days. No initial surface scan exceedances during 1st or 2nd quarter. |
| 10/15/2015 | ROP Semi 1 Cert | Compliance | 6/30/2015 Flare not operational >1 hour, not a deviation but reportable, |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|---|
| 10/15/2015 | ROP Other | Compliance | Semi annual SSM report. (5) GCCS startup events, (4) shutdown events, (1) malfunction-all consistent with plan. No revisions of plan. glm |
| 07/29/2015 | ROP Other | Compliance | Notification of "like" flare replacement. M-001 and C-001 forms. |

Name:  Date: 4/20/17 Supervisor: 
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