

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report


Facility : Lambda Energy Resources, LLC - KALKASKA GAS PLANT	SRN : B4292
Location : 1510 Thomas Road SW	District : Cadillac
	County : KALKASKA
City : KALKASKA State: MI Zip Code : 49646	Compliance Status : Compliance
Source Class : MAJOR	Staff : Jodi Lindgren
FCE Begin Date : 8/1/2018	FCE Completion Date : 9/30/2019
Comments : See CA B429250738 for the inspection and compliance evaluation report.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/03/2019	NSPS (Part 60)	Compliance	Semi-annual report pursuant 40 CFR Subpart KKK (NSPS KKK), Subpart OOOO (NSPS OOOO/OOOOa), and Subpart OOOOa (NSPS OOOO/OOOOa). Eight valve leaks were found for NSPS KKK components. Of those eight valves, six were repaired within the 15-day repair deadline and two were added to the delay of repair (DOR) list. LDAR components were not added nor removed from NSPS KKK subject process units. In the NSPS OOOO/OOOOa subject process units, Leaks were found at 43 valves, one pump, four pressure relief valves (PRVs), and one connector. Forty-one valves, one pump, and 1 connector were repaired within the 15-day repair deadline. Two valves and four PRVs were added to the DOR list. There were no process shut downs during the reporting period, as such, no DOR components were repaired. All DOR components are compliant with the ultimate due date of repair.

Activity Date	Activity Type	Compliance Status	Comments
09/03/2019	ROP Semi 1 Cert ✓	Compliance	MI-ROP-B4292-2014, 2019 1st Semi Annual Report Certification including 1 ROP Deviation Report. Flare opacity limit was exceeded for a total of 18 minutes during a one hour period. Butane from a storage vessel was routed to be flare via a safety valve. Immediate corrective action was taken by adjusting setpoints on the butane transfer pump and repairing a level transmitter. The report was certified appropriately and timely.
09/03/2019	NSPS (Part 60)	Compliance ✓	Certified progress report pursuant to 40 CFR 60 Subpart KKK violations. No items are overdue.
08/23/2019	Scheduled Inspection	Compliance	Scheduled inspection as part of a Full Compliance Evaluation
06/11/2019	Stack Test	Compliance	The stack test for EU-KGPN-TURB-C was completed on May 14, 2019 by Blake Beddow and Jory VanEss of Impact Compliance and Testing, Inc with observation from Kurt Childs, EGLE-AQD. The measured NOx limit was reported as 0.49 lb/MW-hr, the average of 3 test runs, which is 40.8% of the permitted limit of 1.2 lb/MW-hr. The report demonstrates compliance with the conditions of the facility's ROP (MI-ROP-B4292-2014a) and NOx levels below 75% of the limit, 0.9 lb/MW-hr, allowing for NOx verification testing frequency of every two years. In the Impact air emissions test report, Lambda representatives are mistakenly referred to Merit representatives.
05/14/2019	Stack Test Observation	Compliance	EU-KGPN-TURB-C NOx test observation.
03/08/2019	MAERS	Compliance	See MAERS for further info.
03/07/2019	NSPS (Part 60)	Compliance ✓	Certified progress report pursuant to 40 CFR 60 Subpart KKK violations. No items are overdue.
03/06/2019	MAERS	Compliance	See MAERS Report for Further Info.

Activity Date	Activity Type	Compliance Status	Comments
02/22/2019	ROP Annual Cert ✓	Compliance	MI-ROP-B4292-2014, Compliance with the ROP except 1 deviation previously reported, identification of additional open ended line. Immediate actions were taken to comply with NSPS Subpart OOOO. consistent with reporting received and inspections during the year.
01/22/2019	ROP SEMI 2 CERT ✓	Compliance	MI-ROP-B4292-2014, 2018 2nd Semi Annual Report Certification. No deviations. Report was timely and certified.
01/15/2019	NSPS (Part 60)	Compliance ✓	NSPS KKK and OOOO semiannual reports. Leaks, with the exceptions of equipment on the delay of repair list, were repaired within 15 days as specified in the applicable regulations. Delay of repair list is for equip that cannot be repaired until a plant shutdown. The plant does not shut down.
08/07/2018	ROP R215 Notification	Compliance	Change from Bill Loney as RO to Jim McGrath.

Name:  Date: 9/30/2019 Supervisor: 