

M4469
MANNA FCE

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : RIVERVIEW LAND PRESERVE	SRN : M4469
Location : 20863 GRANGE RD	District : Detroit
	County : WAYNE
City : RIVERVIEW State: MI Zip Code : 48193	Compliance Status : Compliance
Source Class : MAJOR	Staff : Jonathan Lamb
FCE Begin Date : 8/17/2016	FCE Completion Date : 8/17/2017
Comments : FCE for Scheduled Inspection performed on August 16, 2107 (RLP, Section 2) and August 17, 2017 (RES, Section 1).	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/17/2017	Scheduled Inspection	Compliance	Scheduled inspection, FY 2017
08/08/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for July 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports an average sulfur content of 85 ppm for the month of July 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 9.74 tons of SO2 emissions.
07/11/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for June 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports an average sulfur content of 104 ppm for the month of June 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 8.83 tons of SO2 emissions.

Activity Date	Activity Type	Compliance Status	Comments
06/06/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for May 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports an average sulfur content of 96 ppm for the month of May 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 7.76 tons of SO2 emissions.
06/02/2017	MAERS	Compliance	Reviewed on 6/2/2017
06/02/2017	Other	Compliance	Review of 2016 MAERS
05/10/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for March 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports a sulfur content of 100 ppm for the month of March 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 4.65 tons of SO2 emissions.
05/10/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for April 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports a sulfur content of 98 ppm for the month of April 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 6.72 tons of SO2 emissions.

Activity Date	Activity Type	Compliance Status	Comments
04/12/2017	ROP Annual Cert	Compliance	Two deviations reported. 1) Facility failed to monitor two wells in January 2016. The wells were raised 30 feet above grade to allow for waste placement and not accessible during monitoring. Wells were monitored the following month and demonstrated compliance. 2) Facility failed to take corrective action within 5 days after a well did not show negative pressure on Dec. 8, 2016. Once the facility realized the oversight, corrective action was taken and the well was returned to compliance on Jan. 12, 2017. AQD was notified on Jan. 24, 2017. Both deviations were reported in the semi-annual deviation reports.
04/12/2017	ROP Annual Cert	Compliance	Report received on time. One deviation reported - facility exceeded annual SO2 limits from FGTURBINES. Facility entered into Consent Order AQD No. 19-2016 on May 24, 2016, to resolve the issue and has installed the sulfur treatment system and received a PTI modification (250-00B); however, the SO2 exceedance must be reported as a deviation until ROP No. MI-ROP-M4469-2015 is modified to include the conditions of PTI No. 250-00B.
04/12/2017	ROP SEMI 2 CERT	Compliance	Report received on time. One deviation reported - facility exceeded annual SO2 limits from FGTURBINES. Facility entered into Consent Order AQD No. 19-2016 on May 24, 2016, to resolve the issue and has installed the sulfur treatment system and received a PTI modification (250-00B); however, the SO2 exceedance must be reported as a deviation until ROP No. MI-ROP-M4469-2015 is modified to include the conditions of PTI No. 250-00B.

Activity Date	Activity Type	Compliance Status	Comments
04/12/2017	MACT (Part 63)	Compliance	Semi-annual Startup, Shutdown, and Malfunction (SSM) and Gas Collection and Control System (GCCS) Reports, as required per 40 CFR Part 63, Subpart A and AAAA and 40 CFR Part 60, Subpart WWW. Riverview Land Preserve reported 120 startup, 32 shutdown, and 57 malfunctions during the reporting period. The malfunctions are summarized in Table 1 of the semi-annual SSM report and all are under 10 minutes in duration. Corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period. GCCS Report contains information used to demonstrate proper operation of the GCCS, including surface monitoring, well monitoring, and flare operation data during the compliance period.
04/12/2017	NSPS (Part 60)	Compliance	Semi-Annual Landfill Gas Treatment System Report, as required per 40 CFR Part 60, Subpart AAAA and 40 CFR 63, Subpart WWW. Facility reported all instances where the system was not operating for more than 1 hour, as required. The longest periods of downtime were 60 hours due to a loss of power from the utility and 14 hours due to the installation of a new LFG line.
04/12/2017	MACT (Part 63)	Compliance	Semi-Annual Landfill Startup, Shutdown, and Malfunction Report, as required per 40 CFR Part 60, Subpart AAAA and 40 CFR 63, Subpart WWW. Facility reported 29 startups and 8 shutdowns during the compliance period and noted that the SSM plan was followed for each startup and shutdown.

Activity Date	Activity Type	Compliance Status	Comments
03/15/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for February 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports a sulfur content of 88 ppm for the month of February 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 4.15 tons of SO2 emissions.
03/06/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for January 2017, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Facility reports a sulfur content of 101 ppm for the month of January 2017, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 3.3 tons of SO2 emissions.
01/24/2017	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for December 2016, as required by CO AQD No. 19-2016, Condition 9.C.2, and PTI No. 250-00B, FGTURBINES, S.C. VII.1. Received via email January 4, 2017; hard copy received January 18, 2017. Facility reports a sulfur content of 88 ppm for the month of December 2016, which is below the limit of 140 ppm in the CO. November 2016 is considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports a 12-month rolling total of 2.15 tons of SO2 emissions.
12/15/2016	ROP Other	Compliance	2015 MAERS Report/ROP Certification Form

Activity Date	Activity Type	Compliance Status	Comments
12/12/2016	CO/CJ	Compliance	Monthly sulfur sampling results and SO2 emission calculations for November 2016, as required by CO AQD No. 19-2016, Condition 9.C.2. Facility reports a sulfur content of 88 ppm for the month of November 2016, which is below the limit of 140 ppm in the CO. November 2016 is also considered the first month in calculating the 12-month rolling SO2 total to show compliance with the limit of 32 tons per 12-months. Facility reports 0.98 tons of SO2 emissions.
10/31/2016	CO/CJ	Compliance	Riverview Energy Systems sent an email on October 31, 2016, providing notification that the sulfur removal system began operation on October 28, 2016, as required by Consent Order AQD No. 19-2016.
10/20/2016	ROP Semi 1 Cert	Compliance	Report received on time. One deviation reported - facility exceeded annual SO2 limits from FGTURBINES. Facility entered into Consent Order AQD No. 19-2016 on May 24, 2016, to resolve the issue; however, the SO2 exceedance must be reported as a deviation until the facility complies with the conditions of the Consent Order.
10/20/2016	ROP Semi 1 Cert	Compliance	One deviation reported. Facility failed to monitor two wells in January 2016. The wells were raised 30 feet above grade to allow for waste placement and not accessible during monitoring. Wells were monitored the following month and demonstrated compliance.

