

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> ADRIAN LANDFILL	<b>SRN :</b> N2369
<b>Location :</b> 1970 NORTH OGDEN HWY	<b>District :</b> Jackson
	<b>County :</b> LENAWEE
<b>City :</b> ADRIAN <b>State:</b> MI <b>Zip Code :</b> 49221	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Diane Kavanaugh Vetort
<b>FCE Begin Date :</b> 7/15/21	<b>FCE Completion Date :</b> 7/15/2022
<b>Comments :</b> Major Source FCE Adrian LF and Adrian Energy facility	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
07/15/2022	On-site Inspection	Compliance	Also contact Eric Brisco, Plant Manager, ADRIAN ENERGY ASSOC (S2)  Complete scheduled compliance inspection Major ROP Sectioned facility: Landfill and Energy Plant
04/12/2022	MAERS	Compliance	MAERS Report Certification received in mail. Original signature received in mail 3/23/22. MAERS submittal received electronically. Section 1 LF and Section 2 Gas to Energy Plant. Report: CO 52 tons; NMOC 8 tons; NOX 8 tons; PM10F 2 tons; SO2 1 ton; VOC 11 tons. Flare: 3.61 mmcf LFG. Engines: 321.33 mmcf LFG. Grdwater stripper also reported. Support docs attached. Stack test & Landgem/mass balance used.
03/14/2022	ROP Annual Cert	Compliance	2021 Annual ROP Cert & Deviation Report. Deviations 6 for the year. Usual well, flare, records. Tables provided with cause/correction. AQD approved well ACTs. Flow/Temp data not recorded 7/7-8 18hrs and 9/15-16 9 hrs. Unknown loss of power. Acceptable. NSPS Report / NESHAP revision effective 9/27/21. 7 times all controls down but never longer than 5 days. SEM 3rd Q 1 exceedance; 4th Q none.

Activity Date	Activity Type	Compliance Status	Comments
03/14/2022	ROP SEMI 2 CERT	Compliance	2021 2nd Semi-annual Cert & Deviation Report. Deviations 3 for this period. Usual well, flare, records. Tables provided with cause/correction. AQD approved well ACTs. Flow/Temp data not recorded 7/7-8 18hrs and 9/15-16 9 hrs. Unknown loss of power. Acceptable.
03/14/2022	NSPS (Part 60)	Compliance	NSPS Semi Annual Report.
02/18/2022	Stack Test	Compliance	Utility Flare Visible Emissions Test Results Report. Test indicates compliance. ROP now requires test every 5 years.
02/18/2022	ROP SEMI 2 CERT	Compliance	2nd Semi-annual ROP 2021 Landfill gas treatment system and SSM Report applicable to Adrian Energy Facility. Treatment System, Control Device (3 ICE). Report 2 manual shutdowns, 8 auto shutdowns =10 and 10 startups. No malfunctions. SSM followed. Longest duration 4hrs20min.
02/18/2022	ROP Annual Cert	Compliance	2021 Annual Certification & Deviation Report. No deviations reported. No support. Note: landfill idled for years, results in lower gas quantities. On CMS FY22 inspection list will verify records.
01/24/2022	Visible Emissions Evaluation	Compliance	VE Test Results Report received. Indicates compliance. Test date 12/13/2021. Secondary/backup control LF Utility Flare exhaust required testing contained in Renewal ROP. Flare was previously tested in accordance with NSPS WWW in 2006. Method 22 120 minute testing w/breaks. Tyler Smith, EIL conducted testing.
12/06/2021	Stack Test Observation	Compliance	Rec'd and reviewed Test Plan for VE of Utility Flare at LF. Renewal 2020 requires 5 year testing. Tyler Smith, EIL Testers submitted. VE only. Scheduled for 12/13. Landfill gas flow rate and proof of flame. Rated capacity 2,200 scfm (last test 2006). Backup to GTE plant. Operates @600-900 scfm normally.

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12/02/2021	ROP Semi 1 Cert	Compliance	Revision to the first semi-annual deviation report submitted on 9/13/21, based on inquiries made on 10/15/21. Contains updated table under 60.757(f)(1), when flare flow or temperature data did not record every 15 minutes. This report should replace the original report.
12/02/2021	Stack Test	Compliance	Copies of the test plan for visible emissions test of the utility (open) flare at Adrian Landfill. Scheduled for Friday, 12/13/21
12/02/2021	ROP Semi 1 Cert	Compliance	Original report submitted 9/7/21, facility is submitting this revision to replace original. SSM Plan. During period there were 6 malfunction events, table 1 contains the date, duration and description of all malfunction events. REQUIRE Future reports to detail equipment involved/ what happened/how long and corrective action in more detail. Nicole agreed.
12/02/2021	ROP R215 Notification	Compliance	LFG to Energy Plant Subpart AAAA Permit Change - OPT IN to new standard. AQD log here and under compliance-ROP-Notice of Change (NOC). This way the next ROP writer would know there is a change needed during the next renewal.
11/11/2021	Visible Emissions Evaluation	Compliance	Test Plan for VE Test of LF Utility Flare. Proposed for December 13, 2021. EIL is the consultant/tester. Method 22 doesn't require opacity therefore does not require Certified reader, only person familiar with process.
10/22/2021	Telephone Notes	Compliance	Call from Dana O, EIL consultant for Republic. Test condition for Open Flare only requires Visible Emissions testing every 5 yrs. The initial NSPS/now Federal Plan test for Open flares is net heating value and exit velocity in addition to VE. This appears to have been an oversight during renewal (possibly older Template version missed this). Agreed w/Dana only have to do VE & preparing to do this now. BTW 5 years is well past initial test and there was no due date in Renewal either. NEXT renewal need to add up to date Testing language.

Activity Date	Activity Type	Compliance Status	Comments
10/15/2021	ROP Semi 1 Cert	Compliance	2021 1st Semi-annual Certification & Deviation Report. Report all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred. Acceptable.
10/15/2021	MACT (Part 63)	Compliance	1st Semi-annual Startup, Shutdown and Malfunction Report (SSM). AL operates backup Open Flare control. Report 26 start-up, 22 shutdown events. 5 malfunction events include in Table. One event Chart Recorder Malfunction 439 hr (18 days). This was not reported on NSPS or Deviation reports.
10/15/2021	ROP Semi 1 Cert	Compliance	2021 1st Semi Annual Cert & Deviation Report - AL operates LF, GCCS, and Open Flare. There were four instances where an oxygen, pressure, and or temperature exceedance could not be resolved with 15 days during this reporting period.
10/15/2021	MACT (Part 63)	Compliance	2021 1st Semi-annual SSM report. Adrian Energy Associates (Section 2). Report 13 downtime events. Treatment System = 4 events. TS & Control Device longest 6/16 49 hrs. Described as high O2 from construction. Gas collection system down 6 times for LF well field work. Monitoring system down 2 times. Report as 6 manual shutdowns; 7 automatic shutdowns; 13 TS start-ups. State gas diverted to flare or wellfield temp shut in. All safety systems & automatic isolation valves assoc. with TS operated properly/no venting of LFG. TS op parameters reported as compliant. Acceptable.

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10/15/2021	NSPS (Part 60)	Compliance	2021 1st Semi- Annual NSPS Report, Adrian LF Section 1. NEW Report Federal Plan item after June 21, 2021. Report well head exceedances. 4 instances when not resolved within 15 days. ACTs requested & approved. Flare report 5 dates down times. State 13 times both controls (Flare/ICEs) were off-line for more than 1 hr. [3 periods when all controls down during Fed Plan period]. No times of no control in excess of 5 days. SEMs: 1st Q, 4 exceedances /all cleared. 2nd Q, no exceedances. Report 5 replacement wells, 1 new, 2 remote, 3 leachate collectors. Acceptable PENDING contact Nicole - why 18 days May continuous monitor down. Not rept'd as deviation; report as malfunction. No info provided why/flare operating/how fixed
10/14/2021	ROP Other	Compliance	R219(1)(a), R216(1)(a)(iv) and R215(5) referenced. AQD received email with attached Notification of Change letter from Aria Energy (prior owner/operator Section 2 Adrian Energy Associates). Ownership change to EPIC Energy Power Investment Company, LLC. No change to Company name in ROP. New RO: Tom Judge, Senior VP of Operations LES Project Holdings, LLC / Adrian Energy Associates, LLC
10/01/2021	ROP R215 Notification	Compliance	Landfill Subpart AAAA Permit Change - OPT IN to new standard. AQD log here and under compliance-ROP-Notice of Change (NOC). This way the next ROP writer would know there is a change needed during the next renewal.
07/28/2021	Other		Sent out response to Request Alternative Compliance Timeline for ADRNCG1R, sent by Diane Kavanaugh Vetort

Name: Diane Kavanaugh Vetort Date: 7/15/22

Supervisor: 