

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> C&C Expanded Sanitary Landfill	<b>SRN :</b> N2896
<b>Location :</b> 14800 P Drive North	<b>District :</b> Kalamazoo
	<b>County :</b> CALHOUN
<b>City :</b> MARSHALL <b>State:</b> MI <b>Zip Code :</b> 49068	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Matthew Deskins
<b>FCE Begin Date :</b> 03/11/2019	<b>FCE Completion Date :</b> 3/11/2020
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
03/11/2020	Scheduled Inspection	Compliance	Unannounced Scheduled Inspection
10/01/2019	Other Non ROP	Compliance	This is a report of the site-specific Total Reduced Sulfur (TRS) Concentration in the Landfill Gas at the facility. The AQD had requested that this testing be done if the facility didn't have recent site-specific data or stack test data regarding sulfur emissions. They also had to calculate their PTE for sulfur using this site specific data and if necessary, modify any current permits or apply for a permit if currently operating any equipment under an exemption. The results of this test indicate TRS levels of 349 ppmv and 45.55 tons per year. However, this open flare was permitted and back then they used a TRS concentration of 550 ppm and requested an SO2 limit of 54.75 tons which was approved. So no further action is required by the landfill at this time.
10/01/2019	NSPS (Part 60)	Compliance	Initial Liquids Addition Report required under 40 CFR Part 60 Subpart XXX that the landfill is now subject to. The landfill has to submit this report on an annual basis if they had recirculated leachate within the past 10 years.

Activity Date	Activity Type	Compliance Status	Comments
09/25/2019	ROP Semi 1 Cert	Compliance	<p>The facility reported 3 deviations with one of them being for not having wellhead exceedences resolved within 15 days. The wellhead exceedences technically aren't deviations since they requested and had approved alternate compliance timelines or alternate operating scenarios for them. The 2nd deviation appeared to be for times when data wasn't monitored and recorded at the open flare but no dates nor durations were given. Staff followed up with the facility about this by e-mail and received a response that the deviation should have been deleted and that there were no instances when flare readings weren't recorded at least once every 15 minutes (See Attached E-Mail). Lastly, they reported a deviation for the control devices (flare and/or gas plant) being down greater than one hour. Staff reviewed these instances and due to the causes of the downtimes that were reported, staff does not consider them to be in violation.</p>
09/25/2019	NSPS (Part 60)	Compliance	<p>See comments made under the ROP Semi-Annual/Annual Certification. Also, please refer to the ROP Certification Report file for a copy of this report.</p>
09/24/2019	MACT (Part 63)	Compliance	<p>This is the semi-annual SSM Report for the landfill. They certified that they had 23 start-ups, 0 shutdowns, and 0 malfunction events occurred during the reporting period. However, they also state that the actions taken to correct them were consistent with the procedures contained in their SSM Plan. They no longer have to report any malfunctions unless they cause or may have caused an applicable limitation to be exceeded.</p>
06/17/2019	NSPS (Part 60)	Compliance	<p>Initial Design Capacity and NMOC Emission Rate Reports for NSPS XXX.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	MACT (Part 63)	Compliance	This is the semi-annual SSM Report for the landfill. They certified that they had 2 start-ups, 0 shutdowns, and 0 malfunction events occurred during the reporting period. These were all related to the flare which is mainly used as a back up control device. However, they also state that the actions taken to correct them were consistent with the procedures contained in their SSM Plan.
03/28/2019	ROP Annual Cert	Compliance	The facility reported deviations of for not having wellhead exceedences resolved within 15 days as well as when flow wasn't being recorded to the flare. The wellhead exceedences technically aren't deviations since they requested and had approved alternate compliance timelines or alternate operating scenarios for them. The flare temperature and flow recording issue only occurred twice and the longest duration was for ~1.5 hours. Staff does not consider these to be violations. They also reported a deviation for when flare flow and/or temperature was not recorded in this report and/or had been reported previously so the data could not be retained for 5 years as required. Lastly, they reported a deviation for the control devices (flare and/or gas plant) being down greater than one hour. Staff reviewed these instances and due to the causes of the downtimes that were reported, staff does not consider them to be in violation.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	ROP SEMI 2 CERT	Compliance	The facility reported deviations of for not having wellhead exceedences resolved within 15 days as well as when flow wasn't being recorded to the flare. The wellhead exceedences technically aren't deviations since they requested and had approved alternate compliance timelines or alternate operating scenarios for them. The flare temperature and flow recording issue only occurred twice and the longest duration was for ~5.0 hours. Staff does not consider these to be violations. Lastly, they reported a deviation for the control devices (flare and/or gas plant) being down greater than one hour. Staff reviewed these instances and due to the causes of the downtimes that were reported, staff does not consider them to be in violation.
03/28/2019	NSPS (Part 60)	Compliance	The Semi-Annual NSPS Report is contained in the ROP Certification Report and staff did not note any issues. Also, please refer to the ROP Certification Report file for a copy of this report.

Name: \_\_\_\_\_ Date: \_\_\_\_\_ Supervisor: \_\_\_\_\_