

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> EAGLE VALLEY RECYCLE & DISPOSAL FACILITY	<b>SRN :</b> N3845
<b>Location :</b> 600 W. SILVER BELL RD.	<b>District :</b> Southeast Michigan
	<b>County :</b> OAKLAND
<b>City :</b> ORION TWP <b>State:</b> MI <b>Zip Code :</b> 48359	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Rebecca Loftus
<b>FCE Begin Date :</b> 06/07/2012	<b>FCE Completion Date :</b> 7/3/2014
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
07/03/2014	Scheduled Inspection	Compliance	
05/30/2014	MAERS	Compliance	Audit Complete; See review notes in MAERS database. - R. Loftus
03/28/2014	ROP Annual Cert	Compliance	Annual Certification, Eagle Valley submitted two semi Annual Reports for the year 2013. The reports incorporated all the requirements of the NSPS. See Semi-Annual Reports for details. Reports reviewed by R. Loftus
03/28/2014	ROP SEMI 2 CERT	Compliance	Semi-Annual, July 1, 2013 – December 31, 2013: For this reporting period, the facility reported 2 deviations. The first deviation was for three wells with oxygen exceedances. In response, Eagle Valley requested to decommission some wells, requested alternate timelines/operating values, and/or achieved compliance through well tuning or re-drilling. The second deviation was to report no flare data recorded for more than 15 minutes at a time. The downtimes were due to power loss after storms and when the skid was de-energized for maintenance; the times of missing data are associated with the flares being shut down for repairs. Responses to the downtimes are consistent with their SSM Plan. Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/28/2014	NSPS (Part 60)	Compliance	Semi-annual NSPS Report, July 1, 2013 – December 31, 2013: The facility properly documented instances in which wells had temperature, oxygen, and pressure exceedances. There no instances in which these exceedances could not be corrected within 15 days. There were no instances during the reporting period in which all the control devices (Treatment System, Flares, and two LF Gas to Energy Engines) were simultaneously not operating for longer than 1 hour in duration. There were no instances in which the gas collection system was down for more than 5 days. The 3rd and 4th quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane. Eagle Valley installed five new wells during this period. Report reviewed by R. Loftus.
03/28/2014	MACT (Part 63)	Compliance	Startup, Shutdown Malfunction Report, July 1, 2013 – December 31, 2013: For this reporting period there were 125 start-up events, 84 shutdown events, and 31 malfunction events. The actions taken in response to these events were consistent with the procedures listed in the SSM Plan and there were no reported exceedances of applicable emission limitations. Attachment 2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during the reporting period. No revisions to the SSM Plan were made during the reporting period. Report reviewed by R. Loftus.
03/17/2014	ROP Other	Compliance	MAERS Certification received on time.
01/31/2014	NESHAP (Part 61)	Compliance	2013 Annual Compliance Report Pursuant to 40 CFR Part 63, Subpart ZZZZ: LFG is the only fuel combusted by the two engines at Eagle Valley. The fuel flow was 532,620 MCF, Ave methane concentration was 52.4%, and the heating value of the LFG was 530 Btu/scf. - R.Loftus

Activity Date	Activity Type	Compliance Status	Comments
11/15/2013	ROP Other	Compliance	<p>Test report for the verification of CO, NOx and VOC emissions from two (2) landfill gas fired CAT G3520C reciprocating internal combustion engines (Permit to Install 116-10). Document prepared by Derenzo and Associates, Inc. dated October 28, 2013.</p> <p>Reported Emission factors for Engines 1 and 2 are below the limits established in the permit.            Engine 1: 0.76 g/bhp-hr NOx, 2.65 g/bhp-hr CO, 0.10 g/bhp-hr VOC.            Engine 2: 0.61 g/bhp-hr NOx, 2.49 g/bhp-hr CO, 0.11 g/bhp-hr VOC.            -R.Loftus</p>
10/15/2013	Stack Test Observation	Compliance	<p>The engines appeared to be operating under normal day to day conditions, see report for parameter details. - R. Loftus</p>
09/20/2013	ROP Semi 1 Cert	Compliance	<p>Semi Annual, January 1, 2013 – June 30, 2013: For this reporting period, the facility reported 2 deviations. The first deviation was for an oxygen exceedance of more than 15 days. Eagle Valley suspected erosion and re-dressed the slope; then continued to tune the well until they achieved compliance. The second deviation was to report no flare data recorded for more than 15 minutes at a time; WM believes these to be software errors and electrical inference. Responses to the deviations are consistent with their SSM Plan. Report reviewed by R. Loftus</p>

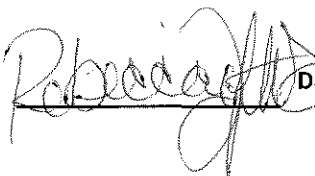
Activity Date	Activity Type	Compliance Status	Comments
09/20/2013	NSPS (Part 60)	Compliance	Semi-annual NSPS Report: The facility properly documented instances in which wells had temperature, oxygen, and pressure exceedances. There was one instance in which the exceedance could not be corrected within 15 days, the exceedance was corrected with additional cover and well tuning (see attachment 2 of the report). There were no instances during the reporting period in which all the control devices (Treatment System, Flares, and two LF Gas to Energy Engines) were simultaneously not operating for longer than 1 hour in duration. There were no instances in which the gas collection system was down for more than 5 days. The 1st and 2nd quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane. There were no new wells drilled at Eagle Valley but in May new vacuum laterals were installed to several wells. Report reviewed by R. Loftus.
09/20/2013	MACT (Part 63)	Compliance	Startup, Shutdown Malfunction Report, January 1, 2013 – June 30, 2013. For this reporting period there were 101 start-up events, 53 shutdown events, and 46 malfunction events. The actions taken in response to these events were consistent with the procedures listed in the SSM Plan and there were no reported exceedances of applicable emission limitations. Attachment 2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during the reporting period. No revisions to the SSM Plan were made during the reporting period.
05/29/2013	MAERS	Compliance	Audit Complete; no changes made. See review notes in MAERS database. -R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
03/28/2013	ROP Annual Cert	Compliance	Annual Certification, January 1, 2012 – December 31, 2012: Eagle Valley submitted two semi Annual Reports for the year 2013. The reports incorporated all the requirements of the NSPS. See Semi-Annual Reports for details. The 1st Semi-Annual was received by Erik Gurshaw. I reviewed the 2nd Semi-annual and Annual reports - R. Loftus
03/28/2013	ROP SEMI 2 CERT	Compliance	Semi-Annual, July 1, 2012 - December 31, 2012: For this reporting period, the facility reported 1 deviation. The deviation was downtime of the treatment system and flare. Eagle Valley reported this per 60.757(f) (3). The down time was due to a power outage at the landfill. Response was consistent with their SSM Plan. - R. Loftus
03/28/2013	NSPS (Part 60)	Compliance	Semi-Annual NSPS Report, July 1, 2012 – December 31, 2012: The facility properly documented instances in which wells had temperature, oxygen, and pressure exceedances (see attachment 2 of the report). There no instances in which these exceedances could not be corrected within 15 days. There was one instance during the reporting period in which all the control devices (Treatment System, Flares, and two LF Gas to Energy Engines) were simultaneously not operating for longer than 1 hour in duration; this was due to a power outage (see attachment 3). There were no instances in which the gas collection system was down for more than 5 days. The 3rd and 4th quarterly scans showed no locations at the landfill that initially exceeded 500ppm methane. Eagle Valley installed seven new gas collectors during this period (see attached map). Report reviewed by R. Loftus.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2013	MACT (Part 63)	Compliance	Startup, Shutdown Malfunction Report, July 1, 2012 – December 31, 2012: For this reporting period there were 69 start-up events, 41 shutdown events, and 27 malfunction events. The actions taken in response to these events were consistent with the procedures listed in the SSM Plan and there were no reported exceedances of applicable emission limitations. Attachment 2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during the reporting period. While compiling this semi-annual report, Eagle Valley noted that 16 start-up events, 6 shutdown events, and 10 malfunction events, relating to the new LFG to energy plant were not report in the 1st half of 2012. No revisions to the SSM Plan were made during the reporting period. Report reviewed by R. Loftus.
03/15/2013	ROP Other	Compliance	2012 MAERS ROP Certification received on time. -R. Loftus
02/01/2013	NESHAP (Part 61)	Compliance	2012 Annual Compliance Report Pursuant to 40 CFR Part 63, Subpart ZZZZ: LFG is the only fuel combusted by the two engines at Eagle Valley. The fuel flow was 515,031 MCF, Ave methane concentration was 52.4%, and the heating value of the LFG was 530 Btu/scf. - R.Loftus
01/17/2013	Stack Test		Compliance Test Report (2) Caterpillar G3520C Internal Combusion Engines
12/26/2012	ROP Other		Compliance test report - 2 Caterpillar G3520C Internal Combustion Engines
09/21/2012	ROP Semi 1 Cert	Compliance	The facility reported one deviation during the January 1, 2012, through June 30, 2012, reporting period. The deviation was for flare #2 or flare #1 outages lasting longer than 1 hour in duration. The date, duration, description, cause, and corrective actions to restart the flare are in Attachment 2 of the semiannual report.

Activity Date	Activity Type	Compliance Status	Comments
09/21/2012	NSPS (Part 60)	Compliance	For the January 1, 2012, through June 30, 2012, reporting period, the facility resolved all pressure, oxygen, and temperature exceedances within 15 days of the initial exceedance, properly reported instances in which the flare was down more than one hour in duration, reported that there were no instances in which the collection system was not in operation for more than 5 days, reported that no surface methane exceedances were detected during the quarterly monitoring events, and reported the installation of 5 new wells (EGLEHV105 through EGLEHV109). This information is required pursuant NSPS Subpart WWW.
09/21/2012	MACT (Part 63)	Compliance	There were 83 startup, 19 shutdown, and 47 malfunctions events during the January 1, 2012, through June 30, 2012, reporting period. Corrective actions were consistent with the site's SSM Plan and no revisions to the plan were made during the reporting period. A summary of the malfunction events is in Attachment 2 of the Semiannual SSM report.
09/11/2012	ROP Other		Test plan for the verification of CO, NOx and VOC emissions from two landfill gas fired CAT G3520C reciprocating internal combustion engines (PTI No. 116-10).

Name:



Date:

7/16/14

Supervisor:



