

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Peoples Landfill, Inc.	SRN : N5397
Location : 4143 E. Rathbun Rd.	District : Bay City
	County : SAGINAW
City : BIRCH RUN State: MI Zip Code : 48415	Compliance Status : Compliance
Source Class : MAJOR	Staff : Gina McCann
FCE Begin Date : 3/5/2019	FCE Completion Date : 5/24/2021
Comments : FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/24/2021	NSPS (Part 60)	Compliance	NSPS JJJJ initial notification for EUICE#6
04/27/2021	Stack Test Observation	Compliance	Initial NSPS JJJJ testing Engine #6
04/21/2021	On-site Inspection	Compliance	Inspection of MI-ROP-N5397-2019a
04/20/2021	Excess Emissions (CEM)	Compliance	Third quarter surface emissions monitoring
04/13/2021	MAERS	Compliance	MAERS
04/13/2021	MAERS	Compliance	MAERS
04/06/2021	ROP Other	Compliance	Semi Annual SSM Report Semi Annual SSM Report (10) GCCS startup events (10) GCCS shutdown events
04/06/2021	NSPS (Part 60)	Compliance	Semi Annual NSPS Report Semi Annual NSPS Report (4) SEM exceedances in the third quarter. (1) failed 3xs, expanded GCCS within 120 days. Added HC-134 in Cell 10 near the side slope riser. No wells exceeding >15 days, GCCS was not down >5 days.

Activity Date	Activity Type	Compliance Status	Comments
04/06/2021	ROP Annual Cert	Compliance	Semi Annual NSPS Report No deviations Semi 1 (4) SEM exceedances in the third quarter. (1) failed 3xs, expanded GCCS within 120 days. Added HC-134 in Cell 10 near the side slope riser. No wells exceeding >15 days, GCCS was not down >5 days. No deviations.
04/06/2021	ROP SEMI 2 CERT	Compliance	Semi Annual NSPS Report (4) SEM exceedances in the third quarter. (1) failed 3xs, expanded GCCS within 120 days. Added HC-134 in Cell 10 near the side slope riser. No wells exceeding >15 days, GCCS was not down >5 days. No deviations.
04/06/2021	ROP Annual Cert	Compliance	No deviations
04/06/2021	ROP SEMI 2 CERT	Compliance	No deviations
04/06/2021	NSPS (Part 60)	Compliance	Semi Annual NSPS Report No deviations
04/06/2021	ROP Other	Compliance	Semi Annual SSM Report (10) GCCS startup events (10) GCCS shutdown events (0) malfunctions All consistent with the plan. SSM plan was not revised.
03/11/2021	Odor Evaluation	Compliance	Odor evaluation related to 3-10-21 complaint.
03/11/2021	Telephone Notes		Call following up to complaint received 3-10-2021.
10/15/2020	ROP Semi 1 Cert	Compliance	No deviations.
10/15/2020	NSPS (Part 60)	Compliance	Semi annual NSPS / SSM report No deviations.
10/15/2020	MACT (Part 63)	Compliance	Subpart AAAA semi annual report (17) SSM events. (17) startup and (17) shutdown events (0) malfunctions. All consistent with the plan. No update to the plan.
10/15/2020	ROP Semi 1 Cert	Compliance	No deviations
10/15/2020	NSPS (Part 60)	Compliance	NSPS WWW report. No deviations
10/15/2020	MACT (Part 63)	Compliance	SSM report. (7) events. No deviations. All consistent w/SSM plan. No updates to the plan.

Activity Date	Activity Type	Compliance Status	Comments
07/29/2020	Self Initiated Inspection	Compliance	Mike Kovalchick, Jackson District, performed an abbreviated SEM of landfill. Nathanael Gentle and Gina McCann were also present from AQD. Report was written by M. Kovalchick, but he was not able to enter being from a different district.
04/27/2020	MAERS	Compliance	EUENGINES#1-4 and EUENGINE5R, and the corresponding activity codes were added. SVENG01 through SVENG05R were added. These emission units come from NANR (SRN P0415) which was previously reported separately, but is now being reported with People's Landfill due to being recently combined under one sectioned ROP. The emissions for these EUs were calculated the same way as last year. New site-specific concentration data was used to calculate SO2 emissions, and VOC emissions under EULANDFILL (Wastewater). Audit passed.
03/30/2020	NSPS (Part 60)	Compliance	(People's) Semi annual NSPS report. There were several instances where the wellhead oxygen, pressure or temperature displayed an exceedance. A table was provided detailing these exceedances. All but two instances were addressed within 15 days. The two instances were addressed through correspondence with EGLE. There is no bypass of the control system. The back-up utility flare had four instances when all control devices were shut down for more than one hour – the downtime does not represent a deviation. There was no time when the entire collection system was not in operation in excess of five days. There were no locations that exceeded the 500-ppm surface methane concentration. The well field was expanded between 6/18/19 and 9/6/19.
03/30/2020	ROP Annual Cert	Compliance	(People's) No deviations reported.
03/30/2020	ROP SEMI 2 CERT	Compliance	(People's) No deviations reported.

Activity Date	Activity Type	Compliance Status	Comments
03/30/2020	MACT (Part 63)	Compliance	(People's) SSM Plan Semi Annual Report. Seven gas collection and control system (GCCS) startup events. Six GCCS shutdown events occurred. Zero GCCS malfunction events. All actions taken were consistent with the SSM Plan. The SSM Plan was not revised.
03/30/2020	NSPS (Part 60)	Compliance	(NANR) Landfill Gas Treatment System NSPS Report, submitted pursuant to 40 CFR Part 60, Subparts A and WWW. No periods when collected LFG bypassed the control device; monitoring devices operated properly; no exceedances of the treatment system operating parameters; there were nine downtime events, seven lasted for one hour or longer; all safety systems and automatic isolation valves associated with the treatment systems operated properly; treatment systems were restarted normally following each downtime period.
03/26/2020	ROP Annual Cert	Compliance	(NANR) No deviations were reported.
03/26/2020	ROP SEMI 2 CERT	Compliance	(NANR) No deviations were reported.
03/26/2020	MACT (Part 63)	Compliance	(NANR) SSM Reporting pursuant to 40 CFR Part 63, Subpart A and Subpart AAAA. Nine downtime periods for the gas treatment system reported: five manual shutdowns (three for maintenance, two for suspected collection system malfunction); and four automatic shutdowns (all due to loss of power/utility down). SSM Plan procedures were followed during all downtime periods. There was a total of nine startup events with actions taken consistent with the SSM Plan. No exceedances of an applicable emission standard were reported. The SSM Plan was not revised.

Activity Date	Activity Type	Compliance Status	Comments
09/26/2019	ROP Semi 1 Cert	Compliance	This cert was submitted by NANR (previously P0415). MI-ROP-N5397-2019 was issued on 2/7/19, in which P0415 and N5397 (People's) combined ROPs. Previously to that, NANR had its own ROP and the reporting period from 1/1/19 - 2/6/19 was covered in the ROP cert under P0415. No deviations reported.
09/26/2019	NSPS (Part 60)	Compliance	Submitted by NANR - report is in P0415 folder. No bypass reported. Monitoring devices operated properly while gas system was in operation. No exceedances. 10 downtime events, eight lasting longer then one hour. No venting occurred. Treatment system restarted normally after each downtime period.
09/26/2019	MACT (Part 63)	Compliance	Submitted by NANR, see P0415 file for report. Semi Annual SSM Report: Two manual shutdown events - one due to maintenance and one due to flare issue. Eight automatic shutdown events - seven due to power loss, one due to damaged well, header, or pipe. Ten start-up events. All actions taken consistent with SSM Plan. No revisions to SSM Plan.
09/25/2019	MACT (Part 63)	Compliance	SSM Report: Nine GCCS startup events consistent with SSM Plan; Nine GCCS shutdown events consistent with SSM Plan; Zero GCCS malfunctions; No revisions to SSM Plan.
09/25/2019	ROP Semi 1 Cert	Compliance	No deviations reported.
09/25/2019	NSPS (Part 60)	Compliance	Well 79 was inadvertently damaged, request to decommission and redrill submitted 6/11/19 and approved 6/12/19. Two positive pressure exceedances lasting longer than 15 days. Request to decommission the two wells (81 and 84) submitted and approved 6/27/19. No bypass exists. Two instances when all control devices shut down for more than one hour due to power loss. No times when entire collection system was not in operation in excess of five days. No methane exceedances. Began expanding well field last week of June 2019. No new wells brought online during reporting period.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	ROP SEMI 2 CERT	Compliance	NANR. Semi-Annual Report Certification. 12/13/2013, Treatment system (Engine 5) down for 0.5 hour due to condensate knock-out problems. 12/22/2013 Treatment system down for 14 hours due to loss of power. glm
05/28/2019	MAERS	Compliance	Emissions were calculated the same as last year. The difference in emissions vs. throughput for SCC Code 30502504 is due to a difference in distance traveled between 2018 and 2017. Supporting documentation was attached. SO2 emissions for the flare were calculated using site-specific sulfur concentrations (the same as NANR, P0415).
03/21/2019	ROP Annual Cert	Compliance	1 deviation reported - O2 exceedance over 15 days. 5/10/18 People's requested to decommission HC13 due to declining gas, approved 6/11/18. MS
03/21/2019	ROP SEMI 2 CERT	Compliance	No deviations reported. MS
03/21/2019	MACT (Part 63)	Compliance	SSM Report (Subpart AAAA). 26 GCCS startups 26 GCCS shutdowns 0 GCCS malfunctions All consistent with SSM plan. 0 revisions to SSM plan.
03/21/2019	NSPS (Part 60)	Compliance	Semi Annual NSPS Report (Subpart WWW) Several exceedances reported: 0 exceedances over 15 days No discharges (no bypass) 6 downtimes over 1 hour long No periods of inoperation longer than 5 days No methane exceedances Expanded the well field: 5 re-drilled wells, 1 new well, 1 horizontal collector

Name: 

Date: 5/24/2021

Supervisor: 