DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N543235617

FACILITY: Southeast Berrien County Landfill Authority		SRN / ID: N5432
LOCATION: 3200 Chamberlain Rd., BUCHANAN		DISTRICT: Kalamazoo
CITY: BUCHANAN		COUNTY: BERRIEN
CONTACT: Tyler Ganus , Environmental Coordinator - SEBCL		ACTIVITY DATE: 07/15/2016
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

Southeast Berrien County Landfill FY 2016 Inspection

On June 30, 2016 AQD staff (Matt Deskins) went to conduct a scheduled unannounced inspection of the Southeastern Berrien County Landfill (SEBCL) located in Buchanan, Berrien County. SEBCL is a licensed Type II municipal solid waste landfill and is subject to the federal New Source Performance Standard (NSPS), 40 CFR Part 60 Subpart WWW, and the National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subpart AAAA. These and other applicable requirements are contained in SEBCL's Renewable Operating Permit (ROP) No. MI-ROP-N5432-2011a. Back in 2008, SEBCL signed an agreement to lease a portion of their property to North American Natural Resources (NANR) for the construction of a landfill gas to energy facility. NANR was issued a permit (PTI No. 296-08) at that time for four stationary reciprocating internal combustion engines (RICE) and this permit/facility is incorporated as Section 2 in the SEBCL's ROP. The engines are also subject to 40 CFR Part 60 Subpart JJJJ. The purpose of the inspection was to determine both SEBCL and NANR's compliance with the preceding air regulations and their respective sections of the ROP. Staff departed for the facility at approximately 10:30 a.m.

Staff arrived at the SEBCL at approximately 12:30 p.m. after travel time and having lunch. Winds were out of the S/SW so staff drove along Chamberlain Road that borders the landfill to the north to see if any odors could be detected. Staff did notice some slight landfill gas and waste odors that staff would consider a 1 on the AQD odor scale. Staff then proceeded to the office area where they were greeted Tyler Ganus (Environmental Compliance Manager). Staff had first met Tyler during a previous inspection back in 2015 after he had taken over for Andrea Alexander. Tyler remembered who staff was and staff let Tyler know that SEBCL and NANR were on their inspection list again for this year. Staff then proceeded into the office area where staff then gave Tyler a copy of the DEQ Environmental Inspection Brochure. Staff then mentioned that the inspection would entail the looking over the requirements of the various emission units contained in the ROP which would be similar to the last inspection

Staff then asked Tyler some general questions before taking time to review records and go on a tour of the landfill. According to Tyler, SEBCL takes in on average 744 tons of waste per day. The landfill operates Monday through Friday from 7 a.m. until 5 p.m. and from 8 a.m. until noon on Saturdays. The landfill also includes a Recycling Center next door to the landfill office that's intended to be used by residents of area municipalities. Staff then asked about the NANR facility and how many engines they have running. Tyler said that they've been running two full time but not at full load. He said the goal in the near future was to get them enough landfill gas to operate at full load. Staff then asked some questions about the wellfield, groundwater treatment system, the open flare, etc., but those things will be mentioned under the emission units of the ROP that are to follow. Staff then looked over records required to be kept by the ROP. The following is a summary of the facilities emission groups, flexible groups, the inspection staff conducted, and the facilities compliance status. It will then be followed by staff's inspection of the NANR facility along with their compliance status in regards to their section of the ROP.

EULANDFILL: Appears to be in COMPLIANCE

As mentioned previously, SEBCL is currently taking in, on average, 744 tons of waste per day. They are keeping track of the waste acceptance rates and that is also a requirement of Part 115 that the OWMRP administers. According to Tyler, they do not re-circulate any leachate and it all ends up going to the POTW in Buchanan after it goes through a nitrification treatment process do to excessive ammonia in it. The facility has an approved active gas collection system and control device (Open Flare). The flare is used as a back-up control device should NANR's engines go down. The landfill has been conducting quarterly surface emissions monitoring and they appear to be keeping the appropriate records as required. Employees of SEBCL conduct the surface emissions monitoring with a Landtec SEM 500. Staff reviewed records that included instrument calibration data, the route

traversed while conducting the monitoring, and the data for the last three quarters since staff's last inspection and no exceedences were documented (See attached for copies of the First two fiscal year reports). They are conducting cover integrity checks once a month as required. They typically conduct these either during the monthly well monitoring or when doing the quarterly surface emissions monitoring. The facility has a Startup, Shutdown, and Malfunction (SSM) Plan on site as required and has been submitting the required semi-annual ROP Certification Reports and SSM Reports to the district office on time.

EUACTIVECOLL: Appears to be in COMPLIANCE

The facility has an approved active gas collection system as required and the materials used in the gas collection system appear to be either HDPE or PVC which meets requirements. The header pipe and lateral lines are HDPE and the well casings are PVC schedule 80. The facility keeps an ASBUILT drawing showing the existing collection system and proposed expansion areas. The facility currently has 72 gas wells and the monthly monitoring is done using an Elkins Envision gas analyzer. The wells are all equipped with Landtech wellheads. Staff at SEBCL does the monitoring and they are recording static pressure (vacuum), oxygen, and temperature as required. Staff reviewed the previous six months of data and the facility has also been taking corrective action in the required time frames or has asked for alternate compliance timelines and/or alternate operating scenarios for any monitoring parameters that exceed NSPS limits. Tyler also mentioned that they are currently installing a pumping system in 4 of the wells for a trial period to see if it helps gas collection. They are waiting on the electrical to be installed to them before they can operate them. The pumps will discharge directly into the leachate system. The facility usually submits the required semi-annual ROP Certification Reports and SSM Reports to the district office.

EUOPENFLARE: Appears to be in COMPLIANCE

The facility has an open flare that is used for back-up purposes should the NANR facility shut down. The flare is a skid mounted unit and the manufacturer is Calidus with a flow rating capacity of 200 to 2000 scfm. The control panel of the flare has been retrofitted with John Zink instrumentation. The open flare is equipped with a Yokogawa electronic data logger that records flow and temperature. The information gets downloaded weekly to their computer. The flare is also equipped with a thermocouple to monitor the continuous presence of a flame. The flare is not equipped with any type of bypass and should the flare shut down while in use, a pneumatic valve (operated by a nitrogen tank) automatically closes preventing emissions from venting to the atmosphere. Tyler said that they installed another blower unit earlier this year so they would have a back-up unit as well as alternate operations between the two.

ASBESTOS: Although the facility stopped accepting this type of waste back in 2000 to satisfy a WHMD violation, the asbestos requirements still need to be included in the ROP since they had at one time accepted asbestos. They have been submitting notifications as required and the facility has warning signs, fencing, and/or natural features surrounding the property which should adequately deter access by the general public.

FGRULE290: Appears to be in COMPLIANCE

The facility currently only been operating the groundwater treatment system under this permit exemption rule and haven't installed anything new using it. The groundwater treatment system is a tray type air stripper the facility installed quite a few years ago. The system is still operating around the clock and consists of 30 pumping wells. The facility is conducting monthly sampling of the influent and effluent for the appropriate contaminants that are required by their NPDES permit and ROP for their groundwater treatment system.

FGCOLDCLEANERS: Appears to be in COMPLIANCE

The coldcleaner is located on in their maintenance garage and is not a heated unit. Staff has reviewed the MSDS sheet on previous occasions and it didn't indicate that the solvent contained any of the listed halogenated compounds that were over 5 percent by weight. Heritage Crystal Clean still maintains it. The unit had operational instructions posted on it but the lid was open and it wasn't being used. Staff mentioned to Tyler that it needs to be closed when not in use. He said he would remind the maintenance staff.

SEBCL INSPECTION CONCLUSION: The facility appears to be in COMPLIANCE with Section 1 of ROP No. MI-ROP-N5432-2011a at the present time. Staff then went on a tour of the landfill with Tyler and did not note any issues. Once back to the office, staff thanked Tyler for his time and departed the facility at approximately 2:00 p.m. to head over to the NANR facility.

North American Natural Resources FY 2016 Inspection

Staff was unable to perform the inspection of NANR on June 30th because the plant operator wasn't there. Staff went back on July 15, 2016 to inspect NANR and finish off the inspection. Staff departed the district office at approximately 10:30 a.m. After travel time and having lunch, staff arrived at the NANR facility at approximately 12:30 p.m. Staff proceeded toward the office but noticed the front door was locked again. There was a pick-up truck parked at the facility so staff thought maybe they were out in the engine room and couldn't hear staff knocking. Staff then pulled the van out in front so anyone that came out of the engine room could see that staff was there. After about 20 minutes and having no one coming out, staff decided to call Victor Sokolowski who is the plant operator but the call just went to his voicemail. Staff then headed over to the landfill to see if they could assist in getting ahold of Victor. Travis, an employee from the landfill, called and got through to Victor. Travis let Victor know that staff was there and Victor said he could be there in about half an hour. Staff then proceeded back to the NANR facility. Victor ended up arriving at approximately 1:40 p.m. Staff introduced them self again to Victor and stated the purpose of the visit. We then proceeded inside the building and into the office area. Staff then exchanged business cards with Victor and gave him a copy of the DEQ Environmental Inspection Brochure. Staff then asked Victor some general questions about operations. The following is a summary of those discussions followed by their ROP requirements and their compliance status with them.

According to Victor, the NANR facility located at SEBCL is permitted and constructed for 4 Caterpillar 3520 internal combustion engines. At the present time, only 3 engines have been installed with only 2 of them operating 24/7 due to lack of landfill gas to operate the 3rd. They are all still the original engines and engines #2 and #3 were running during the inspection. Victor also said that the engines are only running at ¾ load and that the 3rd engine is currently used as a swing engine and is started up when one of the other engines needs to go down for maintenance, which is usually every 1,000 hours. He said that plants current electrical output is 2.6 to 2.8 MW. Engine #1 has a serial number of GZJ00391 and currently has 47,886 hours on it, Engine #2 has a serial number of GZJ00392 and currently has 43,084 hours on it, and Engine #3 has a serial number of GZJ00393 and currently has 45,742 hours on it. Staff then asked about landfill gas flow to the plant and Victor said that they usually have between -33 to -38 inches of vacuum on the wellfield with a current flow of around 940 scfm being combusted by the engines. He said the methane quality of the landfill gas has been ranging around 49% to 50%. Staff then looked over their ROP requirements and they are as follows.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUENGINE1-S2	Caterpillar 3520 landfill gas engine.	7-17-2009	FGENGINES-S2
EUENGINE2-S2	Caterpillar 3520 landfill gas engine.	7-17-2009	FGENGINES-S2
EUENGINE3-S2	Caterpillar 3520 landfill gas engine.	7-17-2009	FGENGINES-S2
EUTREATMENTSYS-S2	This emission unit treats landfill gas before its subsequent use or sale. The treatment system removes particulate to at least the 10 micron level, compresses the landfill gas, and removes enough moisture to ensure good combustion of gas for subsequent use; therefore, guaranteeing that the intent of the destruction of the NMOC will be maintained.	5-9-2011	NA

EUTREATMENTSYS-S2
EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit treats landfill gas before its subsequent use or sale. The treatment system removes particulate to at least the 10 micron level, compresses the landfill gas, and removes enough moisture to ensure good combustion of gas for subsequent use; therefore, guaranteeing that the intent of the destruction of the NMOC will be maintained.

POLLUTION CONTROL EQUIPMENT

Any emissions from any atmospheric vents or stacks associated with the treatments system shall be subject to §60.752(b)(2)(iii)(A) or (B).

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate the treatment system at all times when the collected gas is routed to the treatment system. (40 CFR 60.753(f))

AQD Comment: Appears to be in COMPLIANCE. The facility operates the system whenever landfill gas is routed to it.

2. The permittee shall operate the treatment system so that any emissions from any atmospheric vents or stacks associated with the treatment system shall be subject to §60.752(b)(2)(iii)(A) or (B). (40 CFR 60.752(b)(2)(iii)(C), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. There are no stacks or vents associated with the treatment system.

3. The permittee shall operate the treatment system to comply with the provisions of 60.753(e) and (f), and 60.756 (d). (40 CFR 60.752(b)(2)(iv), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. The system appears to comply with the requirements of Part 60 Subpart WWW.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The treatment system shall be designed as approved by AQD. (40 CFR 60.752(b)(2)(iii)(C), 40 CFR 60.752(b)(2)(i)(D), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. The AQD uses the EPA guidance on the design of the system which it appears to meet.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep up-to-date, readily accessible records of all control or treatment system exceedances of the operational standards in §60.753(e) and (f). (40 CFR 60.758(e), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE. There have been no exceedences to date with the system to staff's knowledge.

2. The permittee shall keep records of all preventative maintenance performed in accordance with the preventative maintenance plan (PMP) prepared pursuant to condition IX.3. of this permit. (40 CFR 60.756(d), R 336.1213(3))

AQD Comment: Will consider them to be in COMPLIANCE. The facility has a PMP and in the past documented maintenance on the treatment system but it hasn't been tracked recently. Maintenance usually consists of greasing things every 6 months and flushing the radiator on the chiller once a year. Staff reminded Victor that they need to document this even if the unit is a low maintenance unit and he said he would.

3. The permittee shall provide information to the AQD as provided in 40 CFR 60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The AQD shall review the information and either approve it, or request that additional information be submitted. The AQD may specify additional appropriate monitoring procedures. (40 CFR 60.756(d)).

AQD Comment: Appears to be in COMPLIANCE. The facility operates the treatment system following EPA guidance for a treatment system.

VII. REPORTING

AQD Comment: Items 1 through 5 below appear to be in COMPLIANCE. The facility is and/or has submitted the below reports.

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be postmarked or received by appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. A description of the operation of the treatment system, the operating parameters that indicate proper performance, and the appropriate monitoring procedures shall be submitted the appropriate AQD District Office for review within 30 days after the issuance of this permit. (40 CFR 60.752(b)(2)(i)(B), 40 CFR 63.1955(a))

5. The permittee shall submit to the appropriate AQD District Office semiannual reports for the landfill gas treatment system. The report shall be received by appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (40 CFR 60.757(f), 40 CFR 63.1980(a), 40 CFR 63.1955(a))

   The report shall include:
   a. Value and length of time for exceedance of applicable parameters monitored under §60.756(d). (R 336.1213 (3), 40 CFR 60.757(f)(1), 40 CFR 63.1980(a), 40 CFR 63.1955(a))
   b. Description and duration of all periods when the gas stream is diverted from the treatment system through a bypass line or the indication of bypass flow. (R 336.1213(3))
   c. Description and duration of all periods when the treatment system was not operating for a period exceeding 1 hour and length of time the control device was not operating. (40 CFR 60.757(f)(3), 40 CFR 63.1980(a), 40 CFR 63.1955(a))
   d. Description and duration of all periods when the treatment system was not operated in accordance with the operating parameters and monitoring procedures that were part of the plan in condition number VII.4. (R 336.1213(3))

6. The permittee shall submit the startup, shutdown, and malfunction (SSM) report to the appropriate AQD District Office and it shall be delivered or postmarked by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (40 CFR 63.10(a)(5), 40 CFR 63.10(d)(5))

AQD Comment: Appears to be in COMPLIANCE. They have been submitting the SSM Report.

IX. OTHER REQUIREMENT(S)

1. The provisions of 40 CFR, Part 60, Subpart WWW apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 1 hour for the treatment system. (40 CFR 60.755(e), 40 CFR 63.1955(a))

AQD Comment: Appears to be in COMPLIANCE.

2. The permittee shall have developed and implemented a written SSM plan according to the provision in 40 CFR 63.6(e)(3) for EUTREATMENTSYS-S2. A copy of the SSM plan shall be maintained on site. (40 CFR 63.1960, (40 CFR 63.1965(c))

AQD Comment: Appears to be in COMPLIANCE. The facility has an SSM Plan on site that was developed according to the NESHAP.

3. The permittee shall have implemented a written preventative maintenance plan (PMP) for EUTREATMENTSYS. At a minimum, the plan shall include a schedule of maintenance activities consistent with manufacturer's recommendations, and the operating variables that will be monitored to detect a malfunction or failure. A copy of the PMP shall be maintained on site and available upon request. (40 CFR 60.756(d), R 336.1213(3), R 336.1911)

AQD Comment: Appears to be in COMPLIANCE. The facility has a PMP and it was also submitted to the AQD.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGENGINES-S2	Landfill gas engines operated by North American Natural Resources SBL-LLC	EUENGINE1-S2 EUENGINE2-S2 EUENGINE3-S2

FGENGINES-S2
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Landfill gas engines operated by North American Natural Resources SBL-LLC. (A fourth engine was permitted, but at the time of this ROP being issued, the engine has not been installed.)

Emission Unit: EUENGINE1-S2, EUENGINE2-S2, EUENGINE3-S2

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.62g/HP*Hr^2	hourly	FGENGINES-S2	SC V 1	40 CFR 52.21(c) and (d)
2. CO	2.8g/HP*Hr^2	hourly	FGENGINES-S2	SC V 1	40 CFR 52.21(c) and (d)
3. VOC	1.0g/HP*Hr^2	hourly	FGENGINES-	SC V 1	40 CFR 60.4233

			S2		

AQD Comment: Appears to be in COMPLIANCE. The engines have been tested annually and they have met the above emission limits to date. The next annual test will probably be conducted later this year according to Victor.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and JJJJ, as they apply to FGENGINES-S2.[2] (40 CFR, Part 60, Subparts A & JJJJ)

AQD Comment: Appears to be in COMPLIANCE.

2. The permittee shall not operate FGENGINES-S2 unless the engines are operated in a manner consistent with good air pollution control practices for minimizing emissions.[2] (40 CFR, Part 60, Subparts A & JJJJ(60.4243(b)(2)(ii))

AQD Comment: Appears to be in COMPLIANCE. The facility appears to be operating and maintaining the engines to minimize emissions.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall verify and quantify criteria pollutant emission rates from FGENGINES-S2 by testing at owner's expense, in accordance with Department requirements. (The initial testing was performed on March 9, 2010.) The permittee must conduct performance testing every 8,760 hours or 3 years after the initial test, whichever comes first. No less than 60 days prior to any testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] (40 CFR, Part 60, Subparts A & JJJJ (40 CFR 60.4243(b)(2)(ii) and 60.4244))

AQD Comment: Appears to be in COMPLIANCE. The facility is now testing the engines in the required timeframes. This had been an issue after the plant was first constructed.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor emissions and operating information for FGENGINES-S2 in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and JJJJ. The permittee shall keep records of all source emissions data and operating information on file at the facility and make them available upon request.[2] (40 CFR, Part 60, Subparts A & JJJJ (40 CFR 60.4245))

AQD Comment: Appears to be in COMPLIANCE. This condition basically states that the facility must maintain information on the owner/operator, address of affected source, engine information, emission control equipment, maintenance records, etc. The facility has this on-site and it was also included as part of their permit application.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

AQD Comment: Appears to be in COMPLIANCE.

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

AQD Comment: Appears to be in COMPLIANCE. They are submitting the semi-annual reports on time.

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

AQD Comment: Appears to be in COMPLIANCE. They are submitting the annual reports on time.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. FGENGINES-S2	16.1[2]	25[2]	40 CFR 52.21(c) & (d)

AQD Comment: Appears to be in COMPLIANCE. The stacks appear to meet the height and dimension requirements.

IX. OTHER REQUIREMENT(S)

1. Within 30 calendar days of the date of permit approval, the permittee shall develop an approvable operation and maintenance plan. The plan shall be kept on site and shall contain the following information as required by 40 CFR 60.4243(b)(2)(ii)[2]:
   - a maintenance plan
   - records of conducted maintenance (40 CFR, Part 60, Subparts A & JJJJ(60.4243(b)(2)(ii))

AQD Comment: Appears to be in COMPLIANCE. The facility submitted an OM&M Plan and they are keeping records of conducted maintenance.

2. The permittee shall comply with the applicable requirements of 40 CFR, Part 60, Subparts A & JJJJ. (40 CFR, Part 60, Subparts A & JJJJ)

AQD Comment: Appears to be in COMPLIANCE. They appear to be complying with Subparts A and JJJJ.

After looking over the ROP requirements, staff went on a tour of the plant with Victor. Staff confirmed the serial numbers and the hours of operation on the engines. Staff then went out to check the open flare skid and Victor showed staff the new blower that had been installed by the landfill recently.

NANR INSPECTION CONCLUSION: The facility appears to be in COMPLIANCE with Section 2 of MI-ROP-N5432-2011a and with the requirements of the NSPS JJJJ at the present time. Staff thanked Victor for their time and departed the facility at approximately 2:40 p.m.

NAME Matt Dahl DATE 7-20-16 SUPERVISOR Mary Douglas 07/28/2016