

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Venice Park RDF	SRN : N5910
Location : 9536 Lennon Rd.	District : Lansing
	County : SHIAWASSEE
City : LENNON State: MI Zip Code : 48449	Compliance Status : Compliance
Source Class : MAJOR	Staff : Julie Brunner
FCE Begin Date : 8/4/2020	FCE Completion Date : 8/4/2021
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/17/2021	Other	Compliance	HOV Request for Gas Well VPL160R2 received 6/17/2021 via email. The demonstration provided is acceptable per ROP No. MI-ROP-N5910-2015a, EUACTIVECOLL, SC III.4. A Higher Operating Value (HOV) of 140°F for well VPL160R2, as allowed by 40 CFR 60.753(c) was approved on 6/17/2021. Gas well VPL160R2 will be operated with a temperature at or below 140°F and an oxygen content of less than 3%. As proposed, if VPL160R2 has a measured temperature greater than 140°F and an oxygen content greater than 3%, the vacuum will be immediately reduced. The well will then be re-monitored within 15 days to determine if the temperature and oxygen concentration have been reduced. This monitoring will continue until either the temperature is below 140°F or the oxygen is below 3%.
06/16/2021	On-site Inspection	Compliance	As part of a Full Compliance Evaluation (FCE), AQD staff conducted a compliance inspection of Venice Park Recycling and Disposal Facility (Venice Park RDF) which operates per the conditions of Renewable Operating Permit (ROP) No. MI-ROP-N5910-2015a.

Activity Date	Activity Type	Compliance Status	Comments
05/27/2021	MAERS	Compliance	2020 MAERS received electronically. Hard copy cert received. Audited
05/27/2021	MAERS	Compliance	2020 MAERS. Cert received 3/19/2021. Audited
05/10/2021	NESHAP (Part 61)	Compliance	Notification pursuant to 40 CFR 61.154(j)- Excavation in an Asbestos-Containing Area, RO: John Gall, District Manager
03/31/2021	ROP SEMI 2 CERT	Compliance	ROP No. MI-ROP-N5910-2015a, Sec. 2. Res. official, Rich Spranger, NANR Director of Operations, NANR Venice Park Generating Station - Landfill Gas Treatment System NSPS report. 40 CFR 60.752(b)(2)(iii)(C) & Startup, Shutdown and Malfunction (SSM) report for gas treatment system; 40 CFR 63, Subpart AAAA, 7 downtime events and 5 that exceeded 1 hour for the treatment system, and no gas vented to atmosphere. 5 manual shutdowns, 2 automatic shutdowns, and 7 startups all consistent with the SSM plan. No deviations.
03/31/2021	ROP Annual Cert	Compliance	ROP No. MI-ROP-N5910-2015a, Res. official, Rich Spranger, NANR Director of Operations
03/31/2021	MACT (Part 63)	Compliance	MI-ROP-N5910-2015a. Annual Compliance report for 40 CFR 63, Subpart ZZZZ. No deviations, information as specified in 40 CFR 63.6650(g)(1) - (3).
03/16/2021	ROP Annual Cert	Compliance	ROP No. MI-ROP-N5910-2015. *Hard copy received.* Sec. 1; Res. official, John Gall, WM District Manager.
03/16/2021	ROP SEMI 2 CERT	Compliance	ROP No. MI-ROP-N5910-2015a. *Hard copy received* Sec. 1; 40 CFR 60, Subpart WWW; 40 CFR 63, Subpart AAAA. Res. official, John Gall, WM District Manager. EUACTIVECOLL - One (1) well with high O ₂ , HOV approved until re-drill/replacement on 12/22/2020. No control devices off-line for > than one (1) hour. 5 wells re-drilled and 6 new horizontal collectors. EULANDFILL - No locations that initially exceeded 500 ppm, as methane, during the 3rd and 4th quarter surface monitoring.

Activity Date	Activity Type	Compliance Status	Comments
03/16/2021	MACT (Part 63)	Compliance	ROP No. MI-ROP-N5910-2015. *Hard copy received* Sec.1. Startup, shutdown and malfunction report; 40 CFR 63, Subpart AAAAA, Res. official, John Gall, WM District Manager. 27 startup events, 27 shutdown events, and no (0) GCCS malfunction events. No revisions made to SSM plan during this reporting period.
01/04/2021	Stack Test	Compliance	Test report of emission units EUNANRENGINE7R, EUNANRENGINE9 and EUNANRENGINE10 for MI-ROP-N5910-2015a and the SI-RICE NSPS; 40 CFR 60, Subpart JJJJ for CO, NOx, and VOC. Results indicate compliance with the emission limits while operating at near 100% load conditions for each engine.
12/24/2020	Other	Compliance	Notification provided that GW-145R (VPL0145R) was installed and activated this week, and GW-145 (VPL00145) was decommissioned. HOV for GW-145 (VPL00145) now null and void.

12/08/2020	Other	Compliance	<p>HOV Request for VPL00145 - A higher operating value for oxygen of 10 percent, and a positive pressure variance (i.e., closure of the wellhead) when oxygen exceeds 10 percent for vertical well VPL00145 until March 4, 2021 was approved. This approval is contingent on following the below procedure based (in part) on USEPA applicability determination index (ADI) Control No. 0600062:</p> <ol style="list-style-type: none"> 1. Nonproductive wells where oxygen concentrations do not decline to acceptable levels after more than one hour of reduced vacuum will be shut off until the gas quality recovers. 2. The monthly monitoring required by 40 CFR 60.755 will be conducted for nonproductive wells that have been shut down, but positive pressure or elevated oxygen concentrations will not be considered exceedances of the operating limits in 40 CFR 60.753. 3. If monthly monitoring indicates that pressure has built up in the nonproductive well and the oxygen concentration still exceeds ten (10) percent, the well will be opened to relieve the pressure and will be shut down until it is monitored the following month. 4. If the monthly monitoring indicates that gas quality has improved (i.e. oxygen concentration has dropped below ten (10) percent), the well will be brought back on line until the gas quality declines again. 5. The quarterly methane surface concentration monitoring per 40 CFR 60.755 will be conducted for wells that have been shut down. Standard remediation steps, including evaluating the need to return wells to full-time service, will be followed if exceedances of the 500 ppm methane surface concentration limit are detected. 6. Facility diagrams must be updated to indicate which wells have been shut down because
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12/08/2020	Other	Compliance	<p>landfill gas production rates are too low to permit continuous extraction.</p> <p>Venice Park will replace this blocked vertical well with a new well within 120-days of the original exceedance on November 4, 2020. The request for the HOV was received in 15-days with 6-months of well head data.</p>
11/18/2020	Other	Compliance	<p>HOV Request for Gas Well VPL177R2 received 11/16/2020 via email. The demonstration provided is acceptable per ROP No. MI-ROP-N5910-2015, EUACTIVECOLL, SC III.4. A Higher Operating Value (HOV) of 140°F for well VPL177R2, as allowed by 40 CFR 60.753(c) was approved on 11/18/2020. Gas well VPL177R2 will be operated with a temperature below 140°F and an oxygen content of less than 3%. As proposed, if VPL177R2 has a measured temperature greater than 140°F and an oxygen content greater than 3%, the vacuum will be immediately reduced. The well will then be re-monitored within 15 days to determine if the temperature and oxygen concentration have been reduced. This monitoring will continue until either the temperature is below 140°F or the oxygen is below 3%.</p>
10/22/2020	Other	Compliance	<p>Approved request to decommission vertical gas well GW-8R (VPL0008R) which has had oxygen in excess of 5.0% since October 7, 2020. Venice Park RDF attributes the oxygen exceedance at GW-8R to the age of waste and declining gas production. Request was received within 15 days and had 6-months of well data was attached. Steve Blayer ok'ed the request.</p>
10/20/2020	Stack Test Observation	Compliance	<p>Testing of EUNANRENGINE7R, EUNANRENGINE9, and EUNANRENGINE10 for CO, NOx, and VOC per the requirements of ROP No. MI-ROP-N5910-2015, and 40 CFR 60, Subpart JJJJ</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2020	ROP Semi 1 Cert	Compliance	ROP No. MI-ROP-N5910-2015, Sec.2. Res. official, Rich Spranger, NANR Director of Operations, NANR Venice Park Generating Station - Landfill Gas Treatment System NSPS report. 40 CFR 60.752(b)(2)(iii)(C)
09/24/2020	ROP Semi 1 Cert	Compliance	Semi-annual Deviation Report; ROP No. MI-ROP-N5910-2015, Sec.1; 40 CFR 60, Subpart WWW; 40 CFR 63, Subpart AAAA. Res. official, John Gall, WM District Manager. EUACTIVECOLL - Two (2) instances when all control devices were off-line for more than one hour. EULANDFILL - No locations that initially exceeded 500 ppm, as methane, during the 1st and 2nd quarter surface monitoring. Delayed calibration of flow meter (last calibrated 10-17-2020) on the open flare with relief request approved 4-23-2020 for enforcement discretion due to COVID. Calibration interval extended (FCI) by 6 months because flow meter has not experienced any physical changes that could affect accuracy.
09/24/2020	MACT (Part 63)	Compliance	ROP No. MI-ROP-N5910-2015, Sec.1. Startup, shutdown and malfunction report; 40 CFR 63, Subpart AAAA, Res. official, John Gall, WM District Manager. 53 startup events, 54 shutdown events, and no (0) GCCS malfunction event.
09/23/2020	MACT (Part 63)	Compliance	ROP No. MI-ROP-N5910-2015, Sec.2. Res. official, Rich Spranger, NANR Director of Operations. Startup, Shutdown and Malfunction (SSM) report for gas treatment system; 40 CFR 63, Subpart AAAA, 1 downtime events that exceeded 1 hour and no gas vented to atmosphere. 1 shutdown, 1 malfunctions, and 1 startups all consistent with the SSM plan. No deviations.

Name: Julie L Brunner Date: 8/4/2021

Supervisor: B.M.