

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

Facility : PINE TREE ACRES, INC.		SRN :	N5984
Location : 36600 29 MILE RD.		District :	Southeast Michigan
		County :	MACOMB
City : LENOX	State: MI	Zip Code : 48048	Compliance Status : Compliance
Source Class : MAJOR	Staff :		Rebecca Loftus
FCE Begin Date : 08/08/2015		FCE Completion Date :	4/12/2016
Comments : See also N8004 Sumpter Energy Associates. These two SRNs make up one stationary source.			

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
04/12/2016	Scheduled Inspection	Compliance	Annual Inspection; see also SRN: N8004 - Sumpter Energy

Activity Date	Activity Type	Compliance Status	Comments
03/21/2016	ROP Other	Compliance	<p>In addition to the ROP modification application, on February 29, 2016, the Southeast Michigan District Office received a request from PTA stating the following: "PTA is requesting that the current daily H2S/TRS monitoring frequency be reduced to weekly as allowed in PTI 160-14, by special conditions FGICENGINES V.2 and FGFLARES V.1." PTA has recorded the daily monitoring for H2S/TRS concentrations for over a year and the recorded concentrations are below the permit limit of 269ppm. Based on the records provided, the AQD granted PTA's request to reduce the H2S/TRS monitoring frequency from daily to weekly (see email dated 3/21/16). It was noted, as stated in the conditions, "If at any time the concentration readings exceed 269 ppm (TRS equivalent), the permittee shall resume sampling and recording on a daily basis and shall review all operating and maintenance activities for the landfill gas collection and treatment system along with keeping records of corrective actions taken." Request reviewed by R. Loftus</p>
03/21/2016	ROP R215 Notification	Compliance	<p>Rule 216 - Administrative Amendment. Copy sent Caryn Owens.</p> <p>Pine Tree Acres (PTA) submitted a M-001 application to incorporate the terms and conditions of PTI 160-14 into ROP No. MI-ROP-N5984-2013 and to amend a typographical error where Waste Management, Inc. was incorrectly listed as the permittee; as listed in the existing ROP, Pine Tree Acres, Inc. is the appropriate permittee. Based on my review of the application and the year's worth of H2S data provided, PTA appears to be in compliance with the terms and conditions of PTI No 160-14 and the AQD should proceed with incorporating the permit into the ROP. Reviewed by R. Loftus</p>

Activity Date	Activity Type	Compliance Status	Comments
03/10/2016	Other Non ROP		NSPS variance request for 40 CFR Part 60 W Subpart WWW - request Granted PTA requested to decommission wells PTAEW81R, PTAEW110, PTAEW341, PTAHC136, PTAHV137, PTAHC362, PTAHC366, and PTAHC482. PTA also requested a higher oxygen operating value for the following (8) wells: PTAEW005, PTAEW011, PTAEW012, PTAHC442, PTAHC443, PTAHC502, PTAHC503, and PTAHC505. See the details of the request and AQD response in the file. Reviewed by R. Loftus
03/10/2016	Other Non ROP		NSPS variance request for 40 CFR Part 60 W Subpart WWW - request Granted PTA requested to decommission wells PTAEW80, PTAEW314, PTAEW315, PTAHC327, PTAHC457, PTAHC458, and PTAHC466. See NSPS Request File for details. Reviewed by R. Loftus
02/09/2016	Stack Test Observation	Non Compliance	Stack Tests scheduled on February 8-19, 2016, for Eight Caterpillar G3520C, gas-fired, reciprocating internal combustion engines: EUCENGINE1 through EUCENGINE8 and two enclosed flares: EUFLARE4 and EUFLARE6.
01/15/2016	Stack Test	Compliance	Stack Test Protocol for the performance testing of eight LFG fueled engines and two enclosed flares operating at Pine Tree Acres Landfill (Permit MI-ROP-N5984-2013 and PTI No. 160-14. The tests are schedule for the weeks of 2/8/16 and 2/15/16. The test Plan was reviewed by R. Loftus and David Patterson (TPU). The results will be entered as a separate report received. -R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
09/30/2015	ROP Semi 1 Cert	Compliance	Semi Annual Report, Jan-June 2014: For this reporting period, the facility reported one deviation (a total of 26 wells). The deviation was for multiple wells that had oxygen, pressure, and/or temperature variances. In response, PTA requested to decommission some wells, requested alternate timelines/operating values, and/or achieved compliance through well tuning, re-drilling, and additional construction. Report reviewed by R. Loftus

Activity Date	Activity Type	Compliance Status	Comments
09/30/2015	NSPS (Part 60)	Compliance	<p>Semi-annual NSPS Report, Jan 1, 2015 – June 30, 2015: The facility properly documented instances in which 26 wells had temperature, oxygen, and pressure exceedances. In the eight instances in which the exceedance could not be corrected within 15 days, the facility requested higher temperature operating variances, alternative timelines, and/or that certain wells be decommissioned; additional wells were also installed where needed. Attachment #2 of the NSPS report provides a detailed account of the duration of each wellhead exceedance. There were two instances during the reporting period in which all the control devices (Treatment System, two enclosed Flares, two back-up flares, and a LF Gas to Energy Plant) were simultaneously not operating for longer than 1 hour in duration. Both down times were due to maintenance activities on the system and condensate pump #1. There were no instances in which the gas collection system was down for more than 5 days. For the 1st quarter surface scans, two locations at the landfill initially exceeded 500ppm methane (1200ppm, 1700ppm, near wells EW102 and EW159). After conducting remedial actions, the 10 day check showed the concentrations at 120ppm and 80ppm; and after 30days: 105ppm and 25ppm. For the 2nd quarter surface scans, five locations at the landfill initially exceeded 500ppm methane. After conducting remedial actions, the 10 day/30day checks showed the concentrations at 100ppm and below. Based on the results the initial exceedances were successfully remediated by PTA. PTA installed 8 new wells and added associated vacuum laterals in cell 22 during this reporting period. Report reviewed by R. Loftus.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2015	MACT (Part 63)	Compliance	<p>Semi-annual SSM Report, January 1, 2015 – June 30, 2015: For this reporting period there were 22 start-up events, 8 shutdown events, and 14 malfunction events. Attachment #2 of the SSM report lists the date, duration, and description of all the malfunction events which occurred during this reporting period. The actions taken in response to these events were consistent with the procedures listed in the SSM Plan. There were revisions to the SSM Plan in April (see file for updated Plan).</p> <p>For 40 CFR Part 63 Subpart ZZZZ: PTA report LFG is the sole fuel used in the engines, for the first half of 2015 fuel flow was: 1,084,561MCF, heating value: 502 Btu/hr, and no know problems with the fuel flow meters.</p> <p>Report reviewed by R. Loftus.</p>

Name: Rebecca Loftus Date: 5/10/16

Supervisor: CJE