

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : CARLETON FARMS LANDFILL	SRN : N5986
Location : 28800 CLARK RD	District : Detroit
	County : WAYNE
City : NEW BOSTON State: MI Zip Code : 48164	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Jonathan Lamb
FCE Begin Date : 07/15/2019	FCE Completion Date : 7/15/2020
Comments : FCE, FY 2020	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/15/2020	On-site Inspection	Non Compliance	Scheduled inspection, FY 2020
06/29/2020	ROP Other	Compliance	On June 25, 2020, AQD received notification via email from Sumpter Energy Associates that EUICENGINE_4 (CAT Model No. G3516) was replaced with an identical unit on June 23, 2020, due to a failed front gear train; the unit only had 35,910 operational hours at the time of replacement. Replacement engine has serial no. 4EK00575, build date of 8/21/1995, and horsepower rating of 1,138 hp.
06/01/2020	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart ZZZZ (RICE NESHAP) Annual Compliance Report for 2019, dated January 20, 2020, for Sumpter Energy at Carleton Farms Landfill (received January 29, 2020, by AQD-SEMI Office). Facility reported 100% heat input provided by LFG, with 1,142,409,000 scf burned in Phase I and 849,244,419 scf burned in Phase II. Average heat value of the LFG ranged from 466 to 527 Btu/scf. No deviations from operating limits or errors in fuel meters were reported during the compliance period.

Activity Date	Activity Type	Compliance Status	Comments
05/12/2020	ROP SEMI 2 CERT	Compliance	<p>2019 Semi-Annual 2 ROP Compliance Certification Report for Section 1 (Carleton Farms Landfill) for the time period July 1 through December 31, 2019. Facility reported 1 deviation for ten occurrences where either the Utility Flare or the Enclosed Flare did not record flow once every 15 minutes due to loss of power or maintenance. The longest event lasted over 375 hours due to a loss of power from a lightning strike. The other events lasted under 4.5 hours.</p> <p>Note: Facility did not report numerous wells which were operating above 131 F without approved HOVs as deviations, stating that since the wellfield was expended within 120 days, the wells do not have to be reported as a deviation. AQD is currently evaluating this interpretation of the rule.</p>
05/12/2020	ROP Annual Cert	Non Compliance	<p>2019 Annual ROP Compliance Certification Report for Section 1 (Carleton Farms Landfill). Facility reported two deviations for multiple occurrences of failing to monitor flow rate of the Utility Flare and Enclosed Flare. These deviations were evaluated during the review of the Semi-Annual Reports.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/12/2020	MACT (Part 63)	Compliance	<p>2019 Semi-Annual 2 Startup, Shutdown, and Malfunction (SSM) Report and Gas Collection and Control System (GCCS) Report for Section 1 (Carleton Farms Landfill), as required per 40 CFR Part 63, Subparts A and AAAA. Carleton Farms Landfill reported 67 startup, 22 shutdown, and 22 malfunction events during the reporting period. The malfunctions are summarized in Table 1 of the semi-annual SSM report. Of note, the facility reported a 375:26 hour period between July 1 and July 16, 2019, in which the Enclosed Flare did not record data due to a lightening strike/voltage drift. Since this occurrence was the result of an act of nature and the facility took appropriate actions to correct the issue, a violation notice will not be issued.</p> <p>For the other reported malfunctions, it appears corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period.</p> <p>Facility reported no exceedances above 500 ppm methane during the quarterly surface monitoring in either the 3rd or 4th Quarter 2019.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/12/2020	NSPS (Part 60)	Compliance	<p>2019 Semi-Annual 2 Gas Collection and Control System (GCCS) Report for Section 1 (Carleton Farms) for the time period July 1 - December 31, 2019, as required per 40 CFR Part 60, Subpart WWW and 40 CFR Part 63, Subparts A and AAAA.</p> <p>The facility reported no time where there was no control for the wellfield for more than one hour. The facility reported no bypasses of the control system and no periods when the entire collection system was down for more than five days. Surface monitoring exceedances were corrected within NSPS guidelines.</p> <p>The facility reported 10 instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Of note, the facility reported a period of 375:26 hours on from July 1 through July 16, 2019, during which time the Enclosed Flare failed to record flow data due to a lightning strike/voltage drift. The other occurrences lasted 4:10 hours or less.</p> <p>Facility reported no exceedances during either the 3rd or 4th Quarter surface scans.</p>
04/30/2020	ROP SEMI 2 CERT	Compliance	2019 Semi-Annual 2 ROP Compliance Certification Report for Section 2 (Sumpter Energy) for the compliance period July 1 through December 31, 2019. No deviations were reported during the compliance period.
04/30/2020	ROP Annual Cert	Compliance	2019 Annual ROP Compliance Certification Report for Section 2 (Sumpter Energy). No deviations were reported during the compliance period.
01/17/2020	Other	Compliance	Change in Responsible Official

Activity Date	Activity Type	Compliance Status	Comments
10/08/2019	ROP Other	Compliance	On October 8, 2019, AQD received notification from Sumpter Energy Associates that EUIENGINE_5 (CAT Model No. G3516) was replaced with an identical unit on September 19, 2019, due to runtime hours. Replacement engine has serial no. 4EK00969, build date of 6/11/1996, and horsepower rating of 1,138 hp.
09/24/2019	ROP Semi 1 Cert	Compliance	2019 Semi-Annual 1 ROP Compliance Certification Report for Section 2 (Sumpter Energy) for the compliance period January 1 through June 30, 2019. No deviations were reported during the compliance period.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	MACT (Part 63)	Non Compliance	<p>2019 Semi-Annual 1 Startup, Shutdown, and Malfunction (SSM) Report and Gas Collection and Control System (GCCS) Report for Section 1 (Carleton Farms Landfill), as required per 40 CFR Part 63, Subparts A and AAAA and 40 CFR Part 60, Subpart WWW. Carleton Farms Landfill reported 38 startup, 18 shutdown, and 27 malfunction events during the reporting period. The malfunctions are summarized in Table 1 of the semi-annual SSM report. Included in Table 1, the facility reported three events in which continuous monitoring was unable to be performed for the Utility Flare and Enclosed Flares for extended periods of time. The flow meter was not operational for the Enclosed Flare for 568.3 hours from March 18-April 11, 2019 and 604.3 hours from June 21-July 16, 2019 due to malfunction and electrical issues. The flow meter for the utility flare was not operational for 485.2 hours from June 2-June 21, 2019 due to malfunction. AQD has determined that the failure to monitor flow rate during these occurrences to be excessive and in violation of 40 CFR 63, Subpart AAAA.</p> <p>For the other reported malfunctions, it appears corrective actions were consistent with the facility's SSM Plan and no revisions to the plan were made during the reporting period.</p> <p>Facility reported no exceedances of 500 ppm methane during the 1st and 2nd Quarter surface monitoring events.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	ROP Semi 1 Cert	Non Compliance	<p>2019 Semi-Annual 1 ROP Compliance Certification Report for Section 1 (Carleton Farms Landfill) for the time period January 1 through June 30, 2019. Facility reported 1 deviation for eight occurrences where either the Utility Flare or the Enclosed Flare did not record flow once every 15 minutes due to flow meter malfunction. This includes events lasting 436 minutes and 204 minutes for the Enclosed Flare and 485 minutes for the Utility Flare.</p> <p>In reviewing these reported deviations, AQD has determined that the failure to monitor flow rate to be excessive and in violation of 40 CFR 63, Subpart AAAA and ROP No. MI-ROP-N5986-2015, Section 1.</p> <p>Note: Facility did not report numerous wells which were operating above 131 F without approved HOVs as deviations, stating that since the wellfield was expended within 120 days, the wells do not have to be reported as a deviation. AQD is currently evaluating this interpretation of the rule.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	NSPS (Part 60)	Non Compliance	<p>Subpart WWW semi-annual report, as required in 40 CFR 60.757(f). Facility submits reports on a annual and semi-annual basis combined with the ROP certification/deviation reports. The report contained the information required per 40 CFR 60.757(f)(1) through (f)(6).</p> <p>The facility reported two occurrences where there was no control for the wellfield for more than one hour: 1:38 hours on June 6, 2019, and 3:04 hours on June 26, 2019. The facility reported no bypasses of the control system and no periods when the entire collection system was down for more than five days. Surface monitoring exceedances were corrected within NSPS guidelines.</p> <p>The facility reported eight instances where either the utility flare or enclosed flare failed to record flow once every 15 minutes. Of note, the facility reported a periods of 436 hours, 485 hours, and 204 hours during which times the utility flare failed to record flow rate once every 15 minutes due to flow meter malfunction. AQD has determined that the failure to monitor flow rate during these periods to be excessive and in violation of 40 CFR 60, Subpart WWW.</p>
08/19/2019	Scheduled Inspection	Non Compliance	Scheduled inspection, FY 2019
08/02/2019	ROP Other	Compliance	On July 29, 2019, AQD received notification from Sumpter Energy Associates that EUIENGINE_7 (CAT Model No. G3516) was replaced with an identical unit on July 23, 2019, due to major maintenance. Replacement engine has serial no. 3RC00467, build date of 11/26/1991, and horsepower rating of 1,138 hp.

Name: 

Date: 8-19-2021

Supervisor: JK