## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## FCE Summary Report

Facility :	Citizens Disposal, Inc.	SRN :	N5991
Location :	2361 W. Grand Blanc Rd.	District :	Lansing
		County :	GENESEE
City :	· · · · · · · · · · · · · · · · ·	npliance us :	Compliance
Source Cla	ass: MAJOR St	taff: Julie B	Irunner
FCE Begin		CE Completion ate :	11/24/2015
Comments			

## List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
11/23/2015	ROP Semi 1 Cert	Compliance	Revised Semi-Annual Deviation Report ROP No. MI-ROP-N5991- 2010; Richard Rolf, Responsible Official. Report revised at AQD request to include the deviation from the Grof flare when the flare control was down for more than 1 hour. The deviation was reported on the Semi-Annual SSM Report for the 1st half of the year.
11/03/2015	Scheduled Inspection	Compliance	Performed a scheduled inspection to determine compliance with ROP No. MI-ROP-N5991-2010.
11/02/2015	ROP Semi 1 Cert	Compliance	Semi-Annual Deviation and Landfill Gas Treatment System Report ROP No. MI-ROP-N5991- 2010 (Section 2), Resp. Official - Marc Pauley
11/02/2015	MACT (Part 63)	Compliance	Semi-Annual Start-up, Shutdown, and Malfunction (SSM) Report - Resp. Official, Robert Borchers, Three (3) malfunction events for the Grof flare due to empty nitrogen tank: 1/4/2015 - duration 0.7 hrs, 6/2/2015 - duration 0.1, 6/20/2015 - duration 1.1 hrs.
11/02/2015	ROP Semi 1 Cert	Compliance	Semi - annual Certification Report per ROP No. MI-ROP-N5991- 2010. Certified by the Responsible Official Robert Borchers, General Manager Revision 11-10-15.

Activity Date	Activity Type	Compliance Status	Comments
11/02/2015	NSPS (Part 60)	Compliance	Semi - annual NSPS Subpart WWW Report for gas collection and control system per MI-ROP- N5991-2010. Certified by Robert Borchers, Responsible Official for Landfill, flares and collection sytem. Deviations - Well head data exceedances: Elevated O2 for 51 days from April 13, 2015 to June 3, 2015. Corrective action implemented within 5 days but compliance O2 concentration not restored. Alternative timeline requested June 11 and approved July 6, 2015. Deviation in flare control for downtime of greater than one hour on 5/14/15 and 6/21/2015. Deviation for flare flow records not being recorded every 15 minutes: Grof flare, 3/11/15 (6 hr 48 min.); Zn flare 3/16/15 (56 min & 18 min), 4/14/15 (5 hr 50 min).
05/27/2015	NESHAP (Part 61)	Compliance	Notice of intent to excavate or otherwise disturb any asbestos - containing waste material that has been deposited and is covered. Citizens plans to install gas extraction wells and lateral piping as part of GCCS expansion and upgrade. During this activity, asbestos-containing waste may be encountered. A DEQ Notification of Intent to Renovate/Demolish form was also submitted.
03/19/2015	ROP Annual Cert	Compliance	MI-ROP-N5991-2010, section 2. Marc Pauley, responsible official. Granger Electric Plant.
03/19/2015	ROP SEMI 2 CERT	Compliance	MI-ROP-N5991-2010, section 2. Marc Pauley, responsible official.

Activity Date	Activity Type	Compliance Status	Comments
03/19/2015	MACT (Part 63)	Compliance	Annual Subpart ZZZZ report. MI- ROP-N5991-2010, section 2. Marc Pauley, responsible official. Includes landfill gas treatment system report and landfill gas engines report. No exceedances were recorded. LFG was not diverted through a bypass line. 55 startup, 51 shutdown and 4 malf. events occurred. Malf events did not cause an applicable limitation to be exceeded. Landfill gas to the engines, and kilowatt output from each engine was continuously monitored and recorded. FGEngines are operating in compliance with the emission standards in Subpart JJJJ.
03/17/2015	MAERS	Compliance	Check MAERS for any review comments. ROP cert. received 3-12-15. Review completed on 3/16/14.
03/16/2015	ROP Annual Cert	Compliance	MI-ROP-N5991-2010. Robert Borchers, Responsible Official for Landfill, flares and collection sytem.
03/16/2015	ROP SEMI 2 CERT	Compliance	MI-ROP-N5991-2010. Robert Borchers, Responsible Official for Landfill, flares and collection system. Minor deviations reported with flare records and flow data.
03/16/2015	NSPS (Part 60)	Compliance	Semi - annual NSPS Subpart WWW Report for gas collection and control system per MI-ROP- N5991-2010. Certified by Robert Borchers, Responsible Official for Landfill, flares and collection sytem. No well head data exceedances nor quarterly surface methane monitoring exceedances.

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Activity Date	Activity Type	Compliance Status	Comments
03/16/2015	MACT (Part 63)	Compliance	Startup, shutdown, malfunction report. Semi - annual NESHAP Subpart AAAA Plan for gas collection and control system during SSM events per MI-ROP- N5991-2010. Certified by Robert Borchers, Responsible Official for Landfill, flares and collection sytem. 75 start-up and 65 shutdown events occurred and actions taken were consistent with the Plan. Records available at facility of events. Also 5 malf. events with flares reported. Control equipment was fixed and back on line within that day or next. Zink flare recorder was down several days due to power failure.
03/16/2015	NESHAP (Part 61)	Compliance	Notification of intent to excavate or otherwise disturb asbestos containing waste during installation activities of four new gas extraction wells and associated lateral piping as part of a landfill gas collection and control system expansion. Notification sent to asbestos group of TPU and LDO.
03/04/2015	Stack Test	Compliance	Stack test results report and signed certification form for performance testing of Granger landfill gas fueled engines EUENGINE6 and EUENGINE7 for MI-ROP-N5991-2010, required by 40 CFR Part 60 Subpart JJJJ. Marc Pauley, Responsible Official. Testing was performed January 6, 2015. Pollutants tested were NOx, CO, VOC to determine concentrations and emission rates. Test report indicates that the results are in compliance with ROP limits. David Patterson approved the protocol for this test on 12/9/14 and was on site for the stack test.

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Date: 11/21/15 Supervisor:

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Page 4 of 4