

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

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| <b>Facility :</b> City of Midland Utilities Division           | <b>SRN :</b> N6004                     |
| <b>Location :</b> 4311 E. Ashman St.                           | <b>District :</b> Bay City             |
|  | <b>County :</b> MIDLAND                |
| <b>City :</b> MIDLAND <b>State:</b> MI <b>Zip Code :</b> 48642 | <b>Compliance Status :</b> Compliance  |
| <b>Source Class :</b> MAJOR                                    | <b>Staff :</b> Gina McCann             |
| <b>FCE Begin Date :</b> 3/29/2022                              | <b>FCE Completion Date :</b> 3/29/2024 |
| <b>Comments :</b> FCE from 9-28-2022 through 3-29-2024.        |  |

**List of Partial Compliance Evaluations :**

| Activity Date | Activity Type   | Compliance Status | Comments   |
|---------------|-----------------|-------------------|--|
| 03/25/2024    | MACT (Part 63)  | Compliance        | Annual RICE MACT Report. The two engines only combust a moisture of landfill gas and digester gas. These comprise 100% of the heat input value.  |
| 03/25/2024    | ROP SEMI 2 CERT | Compliance        | No new wells. Flare flow meter not calibrated in 2023. Working to complete and set forth schedule. Wellhead temperature devices not calibrated, New meter being purchased (currently on back order) that will allow calibration of temperature probes.   |
| 03/25/2024    | MACT (Part 63)  | Compliance        | Semiannual NESHAP Report<br>No new wells. Several wellhead exceedances reported and all corrected within (3) three days. Flare flow meter not calibrated in 2023. Working to complete and set forth schedule. Wellhead temperature devices not calibrated, New meter being purchased (currently on back order) that will allow calibration of temperature probes. Several instances when the treatment system and collection systems were down, mostly due to power outages or maintenance. Most instances were less than 0.5 hours, with the exception of a maintenance event at 3.5 hours. Three (3) SEMs exceedances in Q4 were corrected within 10 days. |

| Activity Date | Activity Type      | Compliance Status | Comments   |
|---------------|--------------------|-------------------|--|
| 03/25/2024    | ROP Annual Cert    | Compliance        | Several wellhead exceedances reported and all corrected within (3) three days. Flare flow meter not calibrated in 2023. Working to complete and set forth schedule. Wellhead temperature devices not calibrated, New meter being purchased (currently on back order) that will allow calibration of temperature probes. Several instances when the treatment system and collection systems were down, mostly due to power outages or maintenance. Most instances were less than 0.5 hours, with the exception of a maintenance event at 3.5 hours. Three (3) SEMs exceedances in Q4 were corrected within 10 days. |
| 03/13/2024    | On-site Inspection | Compliance        | FCE inspection.  |
| 09/29/2023    | MACT (Part 63)     | Compliance        | Semiannual NESHAP Report Two (2) new gas wells installed. Several wells had positive pressure within the semi-annual period. All were returned to compliance within three (3) days of exceedance. Several periods of time when the treatment system was down. Most corresponded to time of wellfield or GTE maintenance and were for less than an hour. One incident lasted for 16.85 hours from 4/18/2023 14:15-4/19/2023 7:06 for wellfield maintenance. Similarly, the collection was down for corresponding time periods. Zero (0) SEMs exceedances reported.  |
| 09/29/2023    | ROP Semi 1 Cert    | Compliance        | GTE data logger downtime 233:26. Replaced system. Did not calibrate temperature device for monitoring wellhead temperature annually. Currently each wellhead has a temperature probe. The site is purchasing a new meter with a digital temperature probe to simplify and correct this deviation moving forward.   |
| 06/27/2023    | Other Non ROP      | Compliance        | Annual Liquids Addition Reporting - 40 CFR Part 62, Subpart OOO No liquids were added in 2022.   |
| 05/03/2023    | MAERS              | Compliance        | MAERS  |

| Activity Date | Activity Type   | Compliance Status | Comments   |
|---------------|-----------------|-------------------|--|
| 03/24/2023    | MACT (Part 63)  | Compliance        | 2nd Half 2022 NESHAP AAAA Report <ul style="list-style-type: none"> <li>• EU-OPENFLARE-Several periods of time when the temperature and flow was not recorded every 15 minutes and there was no back up data. Longest period of time was 2 hours and 29 minutes, which was attributed to data card being removed to download data.</li> <li>• FG-RICEMACT-missing data for digester and landfill gas flow to engines. Three instances with the longest being 50 minutes, due to power offline for outage training.</li> <li>• EU-ACTIVECOLL-Temperature calibration was not conducted annually on instrument used to measure wellhead temperatures. Revise NESHAP requires calibration will calibrate moving forward.</li> </ul> |
| 03/24/2023    | ROP SEMI 2 CERT | Compliance        | <ul style="list-style-type: none"> <li>• EU-OPENFLARE-Several periods of time when the temperature and flow was not recorded every 15 minutes and there was no back up data. Longest period of time was 2 hours and 29 minutes, which was attributed to data card being removed to download data.</li> <li>• FG-RICEMACT-missing data for digester and landfill gas flow to engines. Three instances with the longest being 50 minutes, due to power offline for outage training.</li> <li>• EU-ACTIVECOLL-Temperature calibration was not conducted annually on instrument used to measure wellhead temperatures. Revise NESHAP requires calibration will calibrate moving forward.</li> </ul>                                  |
| 03/24/2023    | ROP Annual Cert | Compliance        |  |
| 03/24/2023    | MACT (Part 63)  | Compliance        | 2022 Annual RICE MACT Report   |

| Activity Date | Activity Type          | Compliance Status | Comments  |
|---------------|------------------------|-------------------|---|
| 10/24/2022    | Stack Test             | Compliance        | <p>EUIENGINE1<br/> CO 2.9 (g/bhp-hr) Limit 4.2 (g/bhp-hr)<br/> NOx 0.65 (g/bhp-hr) Limit 1.0 (g/bhp-hr)<br/> VOC 0.14 (g/bhp-hr) Limit 1.0 (g/bhp-hr)</p> <p>EUIENGINE2<br/> CO 2.5 (g/bhp-hr) Limit 4.2 (g/bhp-hr)<br/> NOx 0.66 (g/bhp-hr) Limit 1.0 (g/bhp-hr)<br/> VOC 0.11 (g/bhp-hr) Limit 1.0 (g/bhp-hr)</p> |
| 10/13/2022    | ROP Semi 1 Cert        | Compliance        | Revised certification received 10/10/22<br>Revised to include pressure exceedance on well with no root cause analysis. VN was sent, see LOV log.  |
| 10/13/2022    | MACT (Part 63)         | Compliance        | Semiannual NESHAP Report<br>Revised report received 10/5/22<br>Revised to incorporate well pressure exceedance and missing root cause analysis. VN was sent, see LOV log for further detail.  |
| 09/27/2022    | Stack Test Observation | Unknown           | NSPS JJJJ testing   |
| 08/30/2022    | On-site Inspection     | Non Compliance    | FCE inspection including SEMs abbreviated survey. Letter mailed to company of results on 9/13/2022, sent by Mike Kovalchick   |
| 06/17/2022    | ROP Other              | Compliance        | Initial Liquids Addition Reporting: 40 CFR 62, Subpart OOO  |
| 04/05/2022    | ROP Other              | Compliance        | Semi Annual SSM Report. No longer required after 9/27/2021.   |

| Activity Date | Activity Type   | Compliance Status | Comments   |
|---------------|-----------------|-------------------|--|
| 04/05/2022    | MACT (Part 63)  | Compliance        | <p>Semi Annual NESHAP AAAA Report and Annual Federal Plan Report</p> <p>Open Flare- FG-RICEMACT VI.1 &amp; MACT AAAA-flow date for digester gas and landfill gas to the engines, periods of missing data related to recorder software issues.</p> <p>Statement certifying prior submission of the respective reports in the first semi-annual report required 63.1981(h) constitutes compliance with the submittal requirements 63.198(a) through (g) and (l).</p> <p>Federal Plan<br/>Nine (9) wellhead pressure exceedances. Corrected within fifteen (15) days, no root cause analysis required. No SEM exceedances reported.</p> <p>Five (5) new wells installed MLC16E02 through MLC16E06. All installed 8/30/2021.</p> |
| 04/05/2022    | MACT (Part 63)  | Compliance        | Annual RICE MACT Report  |
| 04/05/2022    | ROP SEMI 2 CERT | Compliance        | EU-OPENFLARE and GTE Engines missing flow and temperature data. Nine (9) separate events w/longest being approximately a week due to background service faulted and did not send an email notification to alert the site of the issue.   |
| 04/04/2022    | ROP Annual Cert | Compliance        | EU-OPENFLARE and GTE Engines missing flow and temperature data. Nine (9) separate events w/longest being approximately a week due to background service faulted and did not send an email notification to alert the site of the issue.   |

Name: Dina L. McFarland Date: 3-29-2024 Supervisor: Chris Hare