

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Tri-City RDF	SRN : N6007
Location : 426 N. Ruth Rd.	District : Saginaw Bay
	County : SANILAC
City : CARSONVILLE State: MI Zip Code : 48419	Compliance Status : Compliance
Source Class : MAJOR	Staff : Matthew Karl
FCE Begin Date : 4/20/2017	FCE Completion Date : 12/14/2018
Comments : FCE Report from 4/20/17 to 12/14/18. Tri-City RDF appears to be in compliance with MI-ROP-N6007-2017.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/05/2018	Scheduled Inspection	Compliance	Scheduled Inspection to determine compliance with MI-ROP-N6007-2017
09/19/2018	MACT (Part 63)	Compliance	Semi Annual SSM report. (3) startup events, consistent with plan, (3) shutdown events, consistent with plan, (0) malfunctions. glm
09/19/2018	ROP Semi 1 Cert	Compliance	(1) deviation. HZ005 had O2 exceedance and/or positive pressure for >15 days. Initial request for HOV for O2 denied, subsequent request to decommission approved. (2) wells, 16R2 and 19R2, brought online to replace. glm
09/19/2018	NSPS (Part 60)	Compliance	(1) deviation. HZ005 had O2 exceedance and/or positive pressure for >15 days. Initial request for HOV for O2 denied, subsequent request to decommission approved. (2) wells, 16R2 and 19R2, brought online to replace. Flare not operational >1 hr., not a deviation, but reportable. glm

Activity Date	Activity Type	Compliance Status	Comments
04/04/2018	ROP Annual Cert	Compliance	<p>One deviation. Reportable flare downtime, per 60.757(f)(3)</p> <p>3/22/17 (4.2 hrs) Thermocouple maintenance 3/25/17 (7.8 hrs) Flame failure 4/06/17 (6.1 hrs) Utility down 4/7/17 (1.5 hrs) Utility down 4/7/17 (1.4 hrs) Utility down 6/29/17 (2.7 hrs) Thermocouple maintenance</p> <p>(10) wells with exceedances, (2) greater than 15 days Well 19R exhibited O2 and/or +pressure for 96 days between 7/14/17 and 10/18/17, expanded the GCCS within 120 days by installing new horizontal well TRIHZ047 in Cell 11 on 10/29/17. Well 19R was decommission approved in letter dated 2/2/18.</p> <p>TRIHZ005 O2 exceedance for 29 days, between 10/17/17 and 11/15/17. Alt timeline request submitted 10/29/17 requesting HOV. Followed up with phone call, because the request did not state a specific HOV value. Email from S. Walters 12/19/17 said the well was in compliance and no HOV was needed. Site engineer replacement J. Davis sent request 2/26/18 for O2 HOV of 20%, asked them to re-evaluate, did not want to give O2 exceedance for shallow well, did not want to create fire event. 3/27/18 facility added additional clay cover and March reading was in compliance.</p>

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04/04/2018	ROP SEMI 2 CERT	Compliance	<p>One deviation. Reportable flare downtime, per 60.757(f)(3)</p> <p>3/22/17 (4.2 hrs) Thermocouple maintenance 3/25/17 (7.8 hrs) Flame failure 4/06/17 (6.1 hrs) Utility down 4/7/17 (1.5 hrs) Utility down 4/7/17 (1.4 hrs) Utility down 6/29/17 (2.7 hrs) Thermocouple maintenance</p> <p>(10) wells with exceedances, (2) greater than 15 days Well 19R exhibited O2 and/or +pressure for 96 days between 7/14/17 and 10/18/17, expanded the GCCS within 120 days by installing new horizontal well TRIHZ047 in Cell 11 on 10/29/17. Well 19R was decommission approved in letter dated 2/2/18.</p> <p>TRIHZ005 O2 exceedance for 29 days, between 10/17/17 and 11/15/17. Alt timeline request submitted 10/29/17 requesting HOV. Followed up with phone call, because the request did not state a specific HOV value. Email from S. Walters 12/19/17 said the well was in compliance and no HOV was needed. Site engineer replacement J. Davis sent request 2/26/18 for O2 HOV of 20%, asked them to re-evaluate, did not want to give O2 exceedance for shallow well, did not want to create fire event. 3/27/18 facility added additional clay cover and March reading was in compliance.</p>

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04/04/2018	NSPS (Part 60)	Compliance	<p>Semi Annual NSPS</p> <p>One deviation. Reportable flare downtime, per 60.757(f)(3)</p> <p>3/22/17 (4.2 hrs) Thermocouple maintenance 3/25/17 (7.8 hrs) Flame failure 4/06/17 (6.1 hrs) Utility down 4/7/17 (1.5 hrs) Utility down 4/7/17 (1.4 hrs) Utility down 6/29/17 (2.7 hrs) Thermocouple maintenance</p> <p>(10) wells with exceedances, (2) greater than 15 days Well 19R exhibited O2 and/or +pressure for 96 days between 7/14/17 and 10/18/17, expanded the GCCS within 120 days by installing new horizontal well TRIHZ047 in Cell 11 on 10/29/17. Well 19R was decommission approved in letter dated 2/2/18.</p> <p>TRIHZ005 O2 exceedance for 29 days, between 10/17/17 and 11/15/17. Alt timeline request submitted 10/29/17 requesting HOV. Followed up with phone call, because the request did not state a specific HOV value. Email from S. Walters 12/19/17 said the well was in compliance and no HOV was needed. Site engineer replacement J. Davis sent request 2/26/18 for O2 HOV of 20%, asked them to re-evaluate, did not want to give O2 exceedance for shallow well, did not want to create fire event. 3/27/18 facility added additional clay cover and March reading was in compliance.</p>
04/04/2018	MACT (Part 63)	Compliance	<p>Semi Annual SSM Report</p> <p>(10) startup events, all consistent with the SSM plan. (10) shutdown events, all consistent with the SSM plan. (0) malfunctions No revisions to the plan.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/20/2017	ROP Semi 1 Cert	Compliance	<p>Flare not operational for >1 hour, reportable, but not a deviation. (6) six instances. 3/22/2017 and (4.2 hours) on 3/22/2017 and (2.7 hours) on 6/29/2017 for thermocouple maintenance. (7.8 hours) on 3/25/2017 for flame failure. (6.1 hours) on 4/6/2017, (1.5 hours) on 4/7/2017 and (1.4 hours) on 4/4/2017 for utility failure.</p> <p>No surface scan exceedances.</p> <p>(3) Three wells with operational parameters exceeded, however returned to compliance within 15 day timeframe.</p> <p>No new wells to report and the GCCS was not operable for a period of 5 or more days.</p>
09/20/2017	NSPS (Part 60)	Compliance	<p>Semi Annual NSPS Report.</p> <p>Flare not operational for >1 hour, reportable, but not a deviation. (6) six instances. 3/22/2017 and (4.2 hours) on 3/22/2017 and (2.7 hours) on 6/29/2017 for thermocouple maintenance. (7.8 hours) on 3/25/2017 for flame failure. (6.1 hours) on 4/6/2017, (1.5 hours) on 4/7/2017 and (1.4 hours) on 4/4/2017 for utility failure.</p> <p>No surface scan exceedances.</p> <p>(3) Three wells with operational parameters exceeded, however returned to compliance within 15 day timeframe.</p> <p>No new wells to report and the GCCS was not operable for a period of 5 or more days.</p>
09/20/2017	MACT (Part 63)	Compliance	<p>MACT AAAA, Semi Annual SSM Report. (8) Startup events, (8) shutdown events (0) malfunctions. All consistent with the SSM plan, no changes to the SSM plan.</p>

Name:

Matthew H. Karl

Date:

12/17/18

Supervisor:

C. Hare