

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Tri-City Landfill	SRN : N6007
Location : 426 N. Ruth Rd.	District : Bay City
	County : SANILAC
City : CARSONVILLE State: MI Zip Code : 48419	Compliance Status : Compliance
Source Class : MAJOR	Staff : Gina McCann
FCE Begin Date : 3/25/2021	FCE Completion Date : 1/19/2023
Comments : FCE from 03/25/2021 to 01/19/2023	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/09/2022	On-site Inspection	Compliance	Inspection of Renewable Operating Permit (ROP) No. MI-ROP-N6007-2022
10/05/2022	MACT (Part 63)	Compliance	Semi Annual Report for MACT AAAA Two (2) wellfield pressure exceedances, cleared within 1 day. No SEMs exceedances in Q1 or Q2. Flare had five (5) total instances of being down. Two (2) instances where flare data was not recorded at least once every 15 minutes. 4-1-2022 programming error, not recorded for 55 minutes. 6-22-2022 site lost power twice for a total of approximately 2 hours. Two (2) instances when the flare was down for maintenance.
10/05/2022	ROP Semi 1 Cert	Compliance	ROP Semi 1 certification. One deviation. Flare had two (2) instances where flare data was not recorded at least once every 15 minutes. 4-1-2022 programming error, not recorded for 55 minutes. 6-22-2022 site lost power 1 hour 35 minutes.
09/15/2022	ROP Tech Review Notes	Compliance	ROP Renewal Technical Review Notes.

03/31/2022	MACT (Part 63)	Compliance	<p>NESHAP Report</p> <p>Beginning 9/27/2021 the facility began complying with the provisions of the Landfill NESHAP AAAA in lieu of the Federal Plan OOO requirements. Report includes required elements of the annual Feder Plan report for the period of 7/1/2021 to 9/26/2021 and the new semiannual NESHAP report for the period of 9/27/2021 to 12/31/2021.</p> <p>Statement included certifying the following reports were previously submitted pursuant to 40 CFR 60, Subpart WWW: Initial Design Capacity Report, Initial NMOC Emission Rate Report, Initial/ Revised Gas Collection and Control System (GCCS) Design Plan, and Initial Performance Test Report.</p> <p>No well temperature exceedances occurred (131°F for the Federal Plan and 145°F for the Landfill NESHAP). Seven instances of pressure exceedances during period of 7/1/2021 through 12/31/2021. All pressure exceedances were remediated in one day.</p> <p>8 instances when no control devices were operating. Events include flare flame failures, power outages, and flow meter inspections and maintenance. Duration of events range from 0.17 hours to 17.0 hours.</p> <p>8 Instances when the gas collection system was not operating. Events include flare flame failures, power outages, and flow meter inspections and maintenance. Duration of events range from 0.17 hours to 17.0 hours.</p> <p>Two locations exceeded 500 ppm during the third quarter surface methane monitoring conducted on 9/20/2021. Re-monitoring indicates corrective action was effective. During the fourth quarter monitoring conducted on 11/22/2021 two locations exceeded 500ppm. Re-monitoring indicates corrective action was effective. Each surface methane exceedance occurred at different geographic locations at the facility. No new gas collectors were installed.</p>
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03/31/2022	MACT (Part 63)	Compliance	<p>All wellhead exceedances were corrected within 60 days. For exceedances that take longer than 15 days to correct, a root cause analysis is conducted and kept on file at the facility.</p> <p>No wells were subject to enhanced monitoring during the NESHAP reporting period.</p> <p>The facility has recirculated leachate within the past 10 years. Per 40 CFR 62.16724(l) a liquid additions report is required. A hard copy is being sent in the mail to the EPA. Leachate was not recirculated during the reporting period.</p>
03/30/2022	ROP Annual Cert	Compliance	<p>Deviations reported. Two instances of flare not operational for more than 1 hours. Not a deviation but reportable. Two instances where flare data was not recorded at least once every 15 minutes. On 9/30/2021 at 10:56 flow data was not recorded for a period of 15 minutes while the flow recorder was offline for an inspection. Inspection was completed and data recording resumed at 11:11. On 10/25/2021 the site lost power at 17:16. Power was restored, and data recording resumed at 18:01. The deviation report included the period of 7/1/2021 to 12/31/2021.</p> <p>Deviations from the first half of the year were previously reported in ROP Semi 1 Cert.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/30/2022	NSPS (Part 60)	Compliance	<p>Annual NSPS Report</p> <p>During the reporting period the facility was subject to 40 CFR 60, Subpart WWW until 9/26/2021. At that time, the provisions of the revised NESHAP became applicable to the site. The annual report required under the NSPS, Subpart WWW, 60.757(f) includes the beginning of the reporting period until 9/26/2021.</p> <p>5 wells displayed an oxygen or pressure exceedance. No temperature exceedances occurred. No exceedances lasted for more than 15 days.</p> <p>There were 2 instances during the reporting period when the open flare was not in operation for more than 1 hour. On 8/28/2021 the flare was not in operation for 17.0 hours due to flame failure. On 9/22/2021 the flare was not in operation for 3.67 hours due to power outage.</p> <p>Two surface methane exceedances, exceeding 500 ppm, identified during the 3rd quarter 2021 surface monitoring. Location one first measured 1904.9 ppm. Ten days later the location measured 54.4 ppm. One month later the location measured 6.2 ppm. Location two initially measured 5996.3 ppm. Ten days later the location measured 0 ppm. One month later the location measured 0 ppm. Exceedance locations were successfully remediated.</p> <p>No new or replacement wells were installed.</p> <p>2 instances where flare data was not recorded at least once every 15 minutes. On 9/30/2021 while flow recorder was offline for an inspection. On 10/25/2021 during a power outage at the site.</p>
03/30/2022	MAERS	Compliance	<p>2021 MAERS Report Certification. Facility not targeted for audit.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/30/2022	ROP SEMI 2 CERT	Compliance	Deviations reported. Two instances of flare not operational for more than 1 hours. Not a deviation but reportable. Two instances where flare data was not recorded at least once every 15 minutes. On 9/30/2021 at 10:56 flow data was not recorded for a period of 15 minutes while the flow recorder was offline for an inspection. Inspection was completed and data recording resumed at 11:11. On 10/25/2021 the site lost power at 17:16. Power was restored, and data recording resumed at 18:01.
03/30/2022	ROP Other	Compliance	Semiannual SSM Report MACT AAAA Semi Annual SSM Report- (5) startup event, (5) shutdown event and (0) malfunction events. No revisions to the SSM plan. Report cover period of 7/1/2021 to 9/26/2021. The facility states a revision to the NESHAP was published on March 26, 2020, in which the requirements for SSM Plans and reports were removed. The provisions became applicable to the site on 9/27/2021.

Activity Date	Activity Type	Compliance Status	Comments
10/11/2021	ROP Semi 1 Cert	Compliance	<p>Reporting for both the NSPS for Municipal Solid Waste (MSW) Landfills, 40 CFR 60, Subpart WWW, and MSW Landfill Federal Plan - 40 CFR 62 Subpart OOO were included.</p> <p>Deviations were reported. Information of deviations including descriptions, durations and corrective actions taken were provided. There were three (3) instances during the reporting period in which the flare was not in operation for more than 1 hour. All three periods were for maintenance purposes, the longest of which lasted 1.3 hours on 1/7/2021.</p> <p>There were no periods in which the entire collection system was not in operation in excess of five days.</p> <p>Four (4) instances of wells displaying an oxygen or pressure exceedance during the reporting period occurred. The exceedances occurred on 3 different wells, TRIC0003, TRI0020, and TRIC0041, none lasted longer than 15 days and were therefore in compliance. No temperature exceedances occurred.</p> <p>No surface methane exceedances were detected during the reporting period.</p> <p>Two replacement vertical wells were installed. TRIC01R2 and TRIC046R were brought into service on 6/18/2021 and replaced TRIC01R and TRIC046.</p> <p>In accordance with the Federal Plan, there was one period from June 21 to June 30, 2021, in which all control devices and/or the gas collection system was down. The flare was automatically shut down for 0.7 hours on 6/29/2021 due to low flow. The flare automatically restarted.</p>

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10/11/2021	NSPS (Part 60)	Compliance	Tri-City RDF was subject to NSPS for Municipal Solid Waste (MSW) Landfills, 40 CFR 60, Subpart WWW. During this reporting period, EPA enacted the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 (MSW Landfill Federal Plan - 40 CFR 62 Subpart OOO). Beginning June 21, 2021, requirements of Subpart WWW became nonapplicable. As part of the semi annual reporting, the facility included reporting of the 'Annual Report' under the MSW Landfill Federal Plan for the last 9 days of the reporting period. Reporting for both regulations was included in the semi annual report submitted.
10/11/2021	ROP Other	Compliance	MACT AAAA Semi Annual SSM Report- (6) startup event, (6) shutdown event and (0) malfunction events. No revisions to the SSM plan. All start up and shut down events reported to be consistent with the SSM Plan.
09/27/2021	ROP R215 Notification	Compliance	The facility elected to opt-in to the NESHAP AAAA effective 9/27/2021

Name: 

Date: 1/19/2023

Supervisor:

