

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Oakland Heights Development, Inc.	SRN : N6008
Location : 2350 Brown Road	District : Warren
	County : OAKLAND
City : AUBURN HILLS State: MI Zip Code : 48326	Compliance Status : Compliance
Source Class : MAJOR	Staff : Robert Joseph
FCE Begin Date : 7/11/2019	FCE Completion Date : 8/10/2021
Comments : Scheduled inspection of the landfill facility owned by Republic Services and the gas pipeline managed by WMRE.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/30/2021	On-site Inspection	Compliance	Scheduled inspection of the landfill facility owned by Republic Services and the gas pipeline managed by WMRE.
06/28/2021	NSPS (Part 60)	Compliance	HOV request for well 49C up to 145 F. Extension from 01/05/21 request.
05/28/2021	MAERS	Compliance	MAERS Certification form received March 15, 2021.
05/03/2021	NSPS (Part 60)	Compliance	HOV temperature request for gas well 62R. Previous request for this well occurred in Oct. 2020.

04/20/2021	ROP Annual Cert	Compliance	<p>Oakland Heights - Annual Report (Section 1) Jan.1, 2020 - Dec. 31, 2020.</p> <p>Jan. 1, 2020 - June 30, 2020.</p> <p>EUALGCS: There were 15 wells which required additional oxygen, pressure, or temperature correction time beyond the 15 day limit per the permit in Section VI. Five of those wells received either an alternative operating or higher operating value. See the filed report for details.</p> <p>There was no time when the entire collection system was not operating in excess of 5 days. The facility states there were no new replacement wells.</p> <p>EUFLARE: There were 8 instances in which all controls were simultaneously not operational for more than (1) hour (due to maintenance, auto-dialer callout, GM pipeline pressure fluctuations). In addition, there were (3) times when the flare did not record data for 15 minutes. See report. Facility indicates this was due to maintenance. The flare does not have a bypass control system.</p> <p>The facility's H2S readings ranged from 300 to 458 ppm during this time frame.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 1st and 2nd quarter scans performed on Feb. 3 and May 6. The facility's H2S readings ranged from 300 to 475 ppm during this time frame.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 1st and 2nd quarter scans.</p> <p>July. 1, 2020 - Dec. 31, 2020.</p> <p>EUALGCS: There were (3) wells which required additional oxygen, pressure, or temperature correction time beyond the 15-day limit NSPS notification requirement. The facility submitted</p>
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04/20/2021	ROP Annual Cert	Compliance	<p>higher operating requests for these wells.</p> <p>The facility also installed (13) replacement vertical wells and associated piping during this reporting period.</p> <p>There were (0) instances when the entire collection system was not in operation in excess of five days.</p> <p>EUFLARE: There was (1) instance in which all controls were simultaneously not operational for more than (1) hour due to maintenance. In addition, there were (0) times when the flare did not record data for 15 minutes. See report.</p> <p>The facility's H2S readings ranged from 187.5 to 375 ppm during this time frame. The 2nd semi-annual test revealed a concentration of 187.5 ppm.</p> <p>EULANDFILL: The facility reports there were (7) surface scan exceedances during 3rd quarter scan and (0) during the 4th quarter scans. All were successfully remediated within 30 days.</p>
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Activity Date	Activity Type	Compliance Status	Comments
04/20/2021	ROP SEMI 2 CERT	Compliance	<p>Oakland Heights - Semi-Annual Report for Time Period</p> <p>July. 1, 2020 - Dec. 31, 2020.</p> <p>EUALGCS: There were (3) wells which required additional oxygen, pressure, or temperature correction time beyond the 15-day limit NSPS notification requirement. The facility submitted higher operating requests for these wells.</p> <p>The facility also installed (13) replacement vertical wells and associated piping during this reporting period.</p> <p>There were (0) instances when the entire collection system was not in operation in excess of five days.</p> <p>EUFLARE: There was (1) instance in which all controls were simultaneously not operational for more than (1) hour due to maintenance. In addition, there were (0) times when the flare did not record data for 15 minutes. See report.</p> <p>The facility's H2S readings ranged from 187.5 to 375 ppm during this time frame. The 2nd semi-annual test revealed a concentration of 187.5 ppm.</p> <p>EULANDFILL: The facility reports there were (7) surface scan exceedances during 3rd quarter scan and (0) during the 4th quarter scans. All were successfully remediated within 30 days.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/16/2021	ROP SEMI 2 CERT	Compliance	<p>Oakland Heights - Section 1. Semi Annual Start-up, Shutdown and Malfunction (SSM) Report.</p> <p>July. 1, 2020 - Dec 30, 2020.</p> <p>The facility lists 18 start-up and 2 shut-down events having occurred. The facility report reads that all the events were consistent with the procedures listed in the SSM Plan.</p> <p>There were 3 malfunction events which may have caused an applicable limitation to be exceeded. The malfunction events were Auto-Dialer callouts which alerts staff that one must come onsite to address the issue.</p>
04/02/2021	ROP Annual Cert	Compliance	<p>WMRE Annual Certification - Section 2</p> <p>See ROP SEMI 2 CERT for Semi-Annual reports and SSM dated 03/12/21 (for periods 07/01/20 to 12/31/20) and 09/18/20 (for periods 01/01/20 to 06/30/20).</p>
04/02/2021	ROP SEMI 2 CERT	Compliance	<p>WMRE of Michigan - Section 2</p> <p>Semi-Annual report from 07/01/20 to 12/31/20.</p> <p>EU-TREATMENT: The treatment system was shut down for (1) instance during the period for more than 1 hour (4.8 hours). The system was shut down due to loss of landfill gas flow (Oakland Heights).</p>
04/02/2021	ROP SEMI 2 CERT	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 07/01/20 to 12/31/20.</p> <p>Start-ups: 1 treatment event consistent with the SSM plan.</p> <p>Shutdown: 1 shutdown event consistent with the SSM plan.</p> <p>Malfunction: 0 treatment events.</p> <p>No revisions were made this reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/05/2021	NSPS (Part 60)	Compliance	HOV request for well 49C up to 145 F. Extension from 09/24/20 request.
10/29/2020	NSPS (Part 60)	Compliance	HOV temperature extension for well 62R. See file.
10/14/2020	ROP Semi 1 Cert	Compliance	<p>Oakland Heights - Section 1</p> <p>Semi-Annual Report for Time Period Jan. 1, 2020 - June 30, 2020.</p> <p>EUALGCS: There were 15 wells which required additional oxygen, pressure, or temperature correction time beyond the 15 day limit per the permit in Section VI. Five of those wells received either an alternative operating or higher operating value. See the filed report for details.</p> <p>There was no time when the entire collection system was not operating in excess of 5 days. The facility states there were no new replacement wells.</p> <p>EUFLARE: There were 8 instances in which all controls were simultaneously not operational for more than (1) hour (due to maintenance, auto-dialer callout, GM pipeline pressure fluctuations). In addition, there were (3) times when the flare did not record data for 15 minutes. See report. Facility indicates this was due to maintenance. The flare does not have a bypass control system.</p> <p>The facility's H2S readings ranged from 300 to 458 ppm during this time frame.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 1st and 2nd quarter scans performed on Feb. 3 and May 6.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/06/2020	ROP Semi 1 Cert	Compliance	<p>Oakland Heights Development, Inc. - Section 1</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 01/01/20 to 06/30/20.</p> <p>Start-ups: 27 events.</p> <p>Shutdown: 12 events.</p> <p>Malfunction: 15 events. These all lasted between 0.17-7.02 hrs and were related to loss of LFG flow due to changing pressure in the pipeline, auto dialer callout, automatic shutdown of protective systems (blower fault, voltage change), and high wind knockout.</p> <p>Facility states all were made consistent with the SSM Plan. No revisions were made this reporting period.</p>
10/02/2020	NSPS (Part 60)	Compliance	Well HC 01 Decommission.
10/01/2020	NSPS (Part 60)	Compliance	HOV request for well 49C up to 145 F.
10/01/2020	ROP Semi 1 Cert	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 01/01/20 to 06/30/20.</p> <p>Start-ups: 8 treatment events all were consistent with the SSM plan.</p> <p>Shutdown: 5 shutdown events all were consistent with the SSM plan.</p> <p>Malfunction: 3 treatment events all were consistent with the SSM plan. These all lasted 0.1 hr and were related to loss of LFG flow due to changing pressure in the pipeline or auto dialer callout.</p> <p>No revisions were made this reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	ROP Semi 1 Cert	Compliance	<p>WMRE of Michigan, LLC - Section 2</p> <p>Semi-Annual report from 01/01/20 to 06/30/20.</p> <p>EU-TREATMENTSYS: There were 8 instances during this reporting period when all control devices were shut down for more than one hour. Causes were primarily due to loss of landfill gas flow either from the Oakland Heights flare or auto-dialer. Time periods varied between 1.2-5.4 hours.</p>
09/14/2020	NSPS (Part 60)	Compliance	HOV temperature request for gas well 48AR. Previous request made in 2019. See report in file.
07/28/2020	NSPS (Part 60)	Compliance	HOV temperature request for well 062R. Also, requested an HOV for temperature on 11/26/19.
06/23/2020	NSPS (Part 60)	Compliance	Decommission HC 08 due to high oxygen and low methane capture.
06/02/2020	NSPS (Part 60)	Compliance	Well 118. Positive Pressure. ALT. Will camera the line and clear any exceedance.
05/15/2020	ROP SEMI 2 CERT	Compliance	<p>Waste Management Renewable Energy</p> <p>Semi-Annual report from 07/01/19 to 12/31/19.</p> <p>EU-TREATMENT: The treatment system was shut down for 11 instances during the period. The system was shut down primarily due to blower overload and automatic shutdown of control device by designated protective systems at the operating landfill (Oakland Heights).</p>

Activity Date	Activity Type	Compliance Status	Comments
05/15/2020	ROP SEMI 2 CERT	Compliance	<p>Waste Management Renewable Energy</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 07/01/19 to 12/31/19.</p> <p>Start-ups: 11 treatment events all were consistent with the SSM plan.</p> <p>Shutdown: 0 shutdown events occurred.</p> <p>Malfunction: 11 treatment events all were consistent with the SSM plan.</p>
05/15/2020	ROP Annual Cert	Compliance	<p>WMRE Annual Certification</p> <p>See ROP SEMI 2 CERT for Semi-Annual reports and SSM dated 03/16/20 (for periods 07/01/19 to 12/31/19) and 09/17/19 (for periods 01/01/19 to 06/30/19).</p>
05/05/2020	MAERS	Compliance	<p>MAERS Certification form received March 16, 2020.</p>
04/06/2020	NSPS (Part 60)	Compliance	<p>Well HC 08 ALT. Oxygen. New shallow that shall not operate except to relieve pressure. Extension from 03/04/20 request.</p>

03/31/2020	ROP Annual Cert	Compliance	<p>Oakland Heights - Annual Report</p> <p>REPORTING PERIOD: Jan. 1, 2019 - June 30, 2019.</p> <p>EUALGCS: There were 8 wells which required additional oxygen, pressure, or temperature correction time beyond the 15 day limit per the permit in Section VI. See the filed report for details.</p> <p>There was no time when the entire collection system was not operating in excess of 5 days (nearly 3 days between Jan. 28 - Jan 30). The facility states well expansion began on June 19, 2019, with the activation of well 81B.</p> <p>EUFLARE: There were 8 instances in which all controls were simultaneously not operational for more than (1) hour. In addition, there were (5) times when the flare did not record data for 15 minutes. See report.</p> <p>The facility's H2S readings ranged from 300 to 475 ppm during this time frame.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 1st and 2nd quarter scans.</p> <p>REPORTING PERIOD: July. 1, 2019 - Dec. 31, 2019.</p> <p>EUALGCS: There were (16) wells which required additional oxygen, pressure, or temperature correction time beyond the 15-day limit per the permit in Section VI. See the filed report for details. The facility also installed (11) replacement vertical wells and piping. Also, 1,310 feet of compressed airlines and forcemain lines were installed with (5) wells.</p> <p>EUFLARE: There were (11) instances in which all controls were simultaneously not operational for more than (1) hour. In addition, there were (8) times when the flare did not record data</p>
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03/31/2020	ROP Annual Cert	Compliance	<p>for 15 minutes. See report.</p> <p>The facility's H2S readings ranged from 295 to 500 ppm during this time frame. The 2nd semi-annual test revealed a concentration of 443 ppm.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 3rd and 4th quarter scans.</p>
03/31/2020	ROP SEMI 2 CERT	Compliance	<p>Oakland Heights - Section 1. Semi Annual Start-up, Shutdown and Malfunction (SSM) Report.</p> <p>July. 1, 2019 - Dec 30, 2019.</p> <p>The facility lists 37 start-up and 13 shut-down events having occurred. The facility report reads that all the events were consistent with the procedures listed in the SSM Plan.</p> <p>There were 13 Malfunction Events which may have caused an applicable limitation to be exceeded.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/27/2020	ROP SEMI 2 CERT	Compliance	<p>Oakland Heights - Semi-Annual Report for Time Period</p> <p>July. 1, 2019 - Dec. 31, 2019.</p> <p>EUALGCS: There were (16) wells which required additional oxygen, pressure, or temperature correction time beyond the 15-day limit per the permit in Section VI. See the filed report for details. The facility also installed (11) replacement vertical wells and piping. Also, 1,310 feet of compressed airlines and forcemain lines were installed with (5) wells.</p> <p>EUFLARE: There were (11) instances in which all controls were simultaneously not operational for more than (1) hour. In addition, there were (8) times when the flare did not record data for 15 minutes. See report.</p> <p>The facility's H2S readings ranged from 295 to 500 ppm during this time frame. The 2nd semi-annual test revealed a concentration of 443 ppm.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 3rd and 4th quarter scans.</p>
03/11/2020	NSPS (Part 60)	Compliance	HC 08. ALT Oxygen. Newly constructed well possible construction issues.
01/23/2020	NSPS (Part 60)	Compliance	Well 82B ALT. Oxygen. Will investigate well with camera due to presence of liquid. Long term solution expected.
01/22/2020	NSPS (Part 60)	Compliance	Well HC 49C HOV Temperature.
01/21/2020	NSPS (Part 60)	Compliance	Well HC 03 Decommission. Decommission well due positive pressure and wellfield density.
12/09/2019	NSPS (Part 60)	Compliance	Well 62R.
12/09/2019	NSPS (Part 60)	Compliance	Well 081B. ALT Positive Pressure. Lateral line is compromised and will be replaced.
10/24/2019	NSPS (Part 60)	Compliance	Well 49C. HOV Temperature.
10/23/2019	NSPS (Part 60)	Compliance	Well 0024. ALT. Oxygen. Well is buried as a remote well and will camera the well to determine cause of exceedance.

Activity Date	Activity Type	Compliance Status	Comments
09/26/2019	NSPS (Part 60)	Compliance	Well 64 and HC 02 ALT Positive Pressure. Lateral line is compromised and will be replaced.
09/24/2019	ROP Semi 1 Cert	Compliance	<p>Oakland Heights - Semi-Annual Report for Time Period</p> <p>Jan. 1, 2019 - June 30, 2019.</p> <p>EUALGCS: There were 8 wells which required additional oxygen, pressure, or temperature correction time beyond the 15 day limit per the permit in Section VI. See the filed report for details.</p> <p>There was no time when the entire collection system was not operating in excess of 5 days (nearly 3 days between Jan. 28 - Jan 30). The facility states well expansion began on June 19, 2019, with the activation of well 81B.</p> <p>EUFLARE: There were 8 instances in which all controls were simultaneously not operational for more than (1) hour. In addition, there were (5) times when the flare did not record data for 15 minutes. See report.</p> <p>The facility's H2S readings ranged from 300 to 475 ppm during this time frame.</p> <p>EULANDFILL: The facility reports there were no surface scan exceedances during 1st and 2nd quarter scans.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/23/2019	ROP Semi 1 Cert	Compliance	<p>Oakland Heights - Section 1. Semi Annual Start-up, Shutdown and Malfunction (SSM) Report.</p> <p>Jan. 1, 2019 - June 30, 2019.</p> <p>The facility lists 26 start-up and 12 shut-down events having occurred. The facility report reads that all the events were consistent with the procedures listed in the SSM Plan.</p> <p>There were 13 Malfunction Events and the facility contends that the valve closed as intended and that no venting of the gas to the atmosphere occurred. However, surface emissions may have occurred.</p>
09/23/2019	ROP Semi 1 Cert	Compliance	<p>Waste Management Renewable Energy</p> <p>Start-up, Shutdown and Malfunction (SSM) Report. 01/01/19 to 06/30/19.</p> <p>Start-ups: 4 treatment events all were consistent with the SSM plan.</p> <p>Shutdown: 0 shutdown events occurred.</p> <p>Malfunction: 3 treatment events all were consistent with the SSM plan.</p>
09/23/2019	ROP Semi 1 Cert	Compliance	<p>Waste Management Renewable Energy</p> <p>Semi-Annual report from 01/01/19 to 06/30/19.</p> <p>EU-TREATMENT: The treatment system was shut down for 8 instances during the period. The system was shut down primarily due to blower overload and automatic shutdown of control device by designated protective systems.</p>
09/23/2019	NSPS (Part 60)	Compliance	Well HC 07. ALT. Oxygen. Well area was disturbed for final cover.
09/20/2019	NSPS (Part 60)	Compliance	Well 14B. ALT Oxygen. A new wellhead will be installed to allow for vacuum adjustments.

Activity Date	Activity Type	Compliance Status	Comments
09/19/2019	NSPS (Part 60)	Compliance	Well 125. ALT Positive Pressure. Lateral line is compromised and will be replaced.
09/19/2019	NSPS (Part 60)	Compliance	Well 48AR. HOV Temperature. An extension from 06/18/19 request.
08/30/2019	NSPS (Part 60)	Compliance	HC 01 and HC 06. ALT. Oxygen.
08/15/2019	NSPS (Part 60)	Compliance	Well 14B. ALT Oxygen. Pump was serviced so time is granted to allow for well stabilization.
08/09/2019	NSPS (Part 60)	Compliance	Well 104 ALT Oxygen. Well 104 is being converted to a conventional well from a caisson.
07/19/2019	NSPS (Part 60)	Compliance	HC 03 ALT. Oxygen. Will retune HC 03 once construction is complete. Well 48AR ALT. Temperature will be retuned as well.

Name: Robert Joseph Date: 08-16-21

Supervisor: Joyce
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