N8004_FCE- 2017 0503

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FY2017 ROP CMS

FCE Summary Report

| Facility: | SUMPTER ENE | JMPTER ENERGY ASSOCIATES | | | SRN: | N8004 | | |
|---|----------------|--------------------------|----|------------|-------|----------------|------------|-----------------------|
| Location: | 36450 29 MILE | RD | | | | | District : | Southeast Michigan |
| | | | | | | | County: | MACOMB |
| City: LE | NOX TWP | State: | MI | Zip Code : | 48062 | Comp Status | | Compliance |
| Source Class | : MAJOR | | | | | Staf | f: Iranna | Konanahalli |
| FCE Begin D | ate: 3/30/2016 | 3 | | | | FCE Date | Completion | 5/3/2017 |
| Comments: SEA operates its electric power generating engines (Nos. 1-9) in compliance with the permit and incorporated federal regulations (NSPS 4J and SI RICE MACT 4Z). | | | | | | | | |

List of Partial Compliance Evaluations:

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------|-------------------|--|
| 04/28/2017 | Scheduled Inspection | Compliance | FY 2017 Scheduled ROP Major CMS inspection of Sumpter Energy Associates, LP |
| 04/17/2017 | Other . | Compliance | Subject: November 29, 2016, annual, SI RICE NSPS 4J, Stack Test of SEA Engines (NSPS 4J Engines: EU-ICENGINE8 and EU -ICENGINE9) – Compliance Determination |
| 04/17/2017 | Other | Compliance | Subject: Annual (March 2017) Hydrogen Chloride Monitoring for Engine Nos. 1 thru 7 ROP No: MI -ROP-N8004-2013, (FG- ENGINES, V.1 Testing / Sampling) |
| 04/11/2017 | Other | Compliance | Subject: Monthly (March 2017) Sulfur Monitoring for Engine Nos. 8 & 9 (NSPS 4J Engines, FG-ICENGINE2: EU-ICENGINE8 and EU-ICENGINE9) |
| 11/29/2016 | Other | Compliance | Subject: November 29, 2016, annual, SI RICE NSPS 4J, Stack Test of SEA Engines (NSPS 4J Engines: EU-ICENGINE8 and EU -ICENGINE9) – Operating Data |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|---|
| 05/13/2016 | ROP Annual Cert | Compliance | Sumpter Energy reported zero deviations for 2015. A VN was issued to Sumpter Energy on 8/21/15 for record keeping and the hourly SO2 limit. On May 13, 2016, I requested that Ms. Emily Zambuto re-submit the semi-annual/annual reports to include the deviations cited in the VN. Upon further review of the response to the VN, and discussions with Ms. Zambuto during my April 2016 inspection, AQD staff have accepted the original ANNUAL report. Notes from inspection, for record keeping: The 2015 records were provided to AQD, and during by April 2016 Inspection, Sumpter Energy provided all requested records while I was on-site and appears to now be maintaining all required records. For H2S/SO2: the LFG continues to have high H2S concentrations. The AQD continues to evaluate the monthly data provided by Sumpter Energy. During my annual inspection, Ms. Emily Zambuto explained that Sumpter Energy is planning on applying for a permit to add an additional CAT 3520 engine (making a total of 3-3520s). Ms Zambuto is aware the PTI will have SO2 and formaldehyde limits and require sulfur treatment of the LFG so with the permit application Sumpter intends on proposing a project to treat the LFG sent to the 3520 engine plant. Sumpter Energy is meeting with WM next week to discuss treatment options The AQD will continue to monitor the H2S data providedR. Loftus |

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|---------------|-----------------|-------------------|---|
| 05/13/2016 | ROP SEMI 2 CERT | Compliance | Sumpter Energy reported zero deviations for 2015. A VN was issued to Sumpter Energy on 8/21/15 for record keeping and the hourly SO2 limit. On May 13, 2016, I requested that Ms. Emily Zambuto re-submit the semi-annual/annual reports to include the deviations cited in the VN. Upon further review of the response to the VN, and discussions with Ms. Zambuto during my April 2016 inspection, AQD staff have accepted the original SEMI-ANNUAL report. Notes from inspection, for record keeping: The 2015 records were provided to AQD, and during by April 2016 Inspection, Sumpter Energy provided all requested records while I was on-site and appears to now be maintaining all required records. For H2S/SO2: the LFG continues to have high H2S concentrations. The AQD continues to evaluate the monthly data provided by Sumpter Energy. During my annual inspection, Ms. Emily Zambuto explained that Sumpter Energy is planning on applying for a permit to add an additional CAT 3520 engine (making a total of 3-3520s). Ms Zambuto is aware the PTI will have SO2 and formaldehyde limits and require sulfur treatment of the LFG so with the permit application Sumpter intends on proposing a project to treat the LFG sent to the 3520 engine plant. Sumpter Energy is meeting with WM next week to discuss treatment options. The AQD will continue to monitor the H2S data providedR. Loftus |

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|---------------|----------------------|-------------------|---|
| 05/13/2016 | ROP Other | Compliance | Test report for total chlorinated compound content of Landfill gas used to fuel reciprocating internal combustion engines at the Sumpter Energy Associates, Pine Tree Acres facility, received 3/15/16: According to the report, the HCl emission factor was in compliance with permit limit of 0.7 lb/hr. The results indicate HCl emissions were 1.18 lb/MMscf or 0.16 lb/hr (calculated using a flow rate of 2,240 scfm for Engines1-7). The test results are similar to last year's results. Report reviewed by R. Loftus |
| 04/12/2016 | Scheduled Inspection | Compliance | Annual Inspection; See also N5984, Pine Tree Acres Landfill. These two SRNs make up one stationary source. |
| 04/11/2016 | ROP Other | Compliance | MAERS Certification form; received on 3/15/16R. Loftus |

Name: MUNUMADAM 5/3/20/Supervisor: Page 4 of 4