

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

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FCE Summary Report

Facility : C&C Energy LLC	SRN : P0222
Location : 19401 15 MILE RD	District : Kalamazoo
	County : CALHOUN
City : MARSHALL State: MI Zip Code : 49068	Compliance Status : Compliance
Source Class : MAJOR	Staff : Matthew Deskins
FCE Begin Date : 3/11/2019	FCE Completion Date : 3/11/2020
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/11/2020	Scheduled Inspection	Compliance	Unannounced Scheduled Inspection
09/24/2019	ROP Semi 1 Cert	Compliance	The facility reported a deviation for not maintaining records for five years which had been previously reported and staff does not consider the plant downtimes to be violations.
09/24/2019	MACT (Part 63)	Compliance	This is the semi-annual SSM Report. The facility certified that they had 16 malfunctions occur during the reporting period. However, they also state that the actions taken to correct them were consistent with the procedures contained in their SSM Plan. Facilities only have to report the specifics of any SSM events if an exceedance of any applicable emission limit did or may have occurred.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2019	NSPS (Part 60)	Compliance	Although they don't specifically mention it on their ROP Certification submittal, the semi-annual NSPS/Landfill Gas Treatment Report is included as part of that report and relates to operation of their treatment system. This report has a few things that need to be reported if necessary but it typically just lists the downtimes of the control system greater than one hour. Please see the semi-annual/annual ROP certifications for comments as well as that file for a copy of the report.
08/15/2019	Stack Test	Compliance	Sulfur Testing on the turbine using an ASTM Method to demonstrate compliance with the NSPS KKKK limit of 0.15 lb/MMBtu. The results indicate potential sulfur emissions at 0.10 lb/MMBtu. Normally in the past, they would do stack testing for NOx and SO2 concurrently. However, the last stack test indicated NOx emissions were 75% or lower than the permitted limit, so they could go to every 2 years for NOx testing. So that's why they did the ASTM Method for sulfur for this year at least.
03/28/2019	ROP Annual Cert	Compliance	The facility reported a deviation for not maintaining records for five years which had been previously reported and staff does not consider the plant downtimes to be violations.
03/28/2019	ROP SEMI 2 CERT	Compliance	The facility reported a deviation for not maintaining records for five years which had been previously reported and staff does not consider the plant downtimes to be violations.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	NSPS (Part 60)	Compliance	Although they don't specifically mention it on their ROP Certification submittal, the semi-annual NSPS/Landfill Gas Treatment Report is included as part of that report and relates to operation of their treatment system. This report has a few things that need to be reported if necessary but it typically just lists the downtimes of the control system greater than one hour. Please see the semi-annual/annual ROP certifications for comments as well as that file for a copy of the report.
03/28/2019	MACT (Part 63)	Compliance	This is the semi-annual SSM Report. The facility certified that they had 15 malfunctions occur during the reporting period. However, they also state that the actions taken to correct them were consistent with the procedures contained in their SSM Plan. Facilities only have to report the specifics of any SSM events if an exceedance of any applicable emission limit did or may have occurred.

Name: Matt Decker

Date: 3-12-20

Supervisor: RIL 3/16/20