

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

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 : 8/9/2021	FCE Completion Date : 8/9/2022
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/09/2022	On-site Inspection	Compliance	Unannounced Scheduled Inspection
04/28/2022	MAERS	Compliance	ROP certification report for MAERS
03/28/2022	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.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2022	MACT (Part 63)	Compliance	This is the semi-annual SSM Report. The facility certified that they had 32 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. NOTE: On September 27, 2021 a revised MACT AAAA took effect and it no longer requires SSM events to be recorded or reported unless required by another rule.
03/28/2022	ROP Annual Cert	Compliance	The facility reported a deviation for not maintaining records for five years (which ended during the 1st Semi-Annual Reporting Period and had previously been reported) and staff does not consider the plant downtimes listed for the whole year to be violations.
03/28/2022	ROP SEMI 2 CERT	Compliance	The facility certified that no deviations occurred during the reporting period.
09/27/2021	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.
09/27/2021	MACT (Part 63)	Compliance	This is the semi-annual SSM Report. The facility certified that they had 31 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
09/27/2021	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.
09/01/2021	Other Non ROP	Compliance	Compliance Emissions Gas Sample Report for Sulfur Fuel content. It was determined using total sulfur methods described in 40 CFR 60.4415. PLEASE NOTE: The sulfur testing on the turbine is now done using an ASTM Method to analyze a Suma Cannister sample to demonstrate compliance with the limit. Normally in the past, they would conduct stack testing for NOx and SO2 emissions concurrently. However, the stack test in 2018 indicated NOx emissions were 75% or lower than the permitted limit, so they could go to every 2 years for NOx testing. So unless the NOx emissions increase that would change its testing frequency back to annually, they will be testing for NOx every 2 years by stack testing and using the ASTM Method and Suma Cannister Sample for Sulfur every year. The report indicates compliance with their limit(s). The result was 233 ppmv of sulfur which equates to potential emissions of SO2 of 0.08 lb/MMBtu and the NSPS/Permit Limit is 0.15 lb/MMBtu.

Name: Matt Dark

Date: 8-18-22

Supervisor: RIL 8/23/22