

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Tri-City RDF	SRN : N6007
Location : 426 N. Ruth Rd.	District : Saginaw Bay
	County : SANILAC
City : CARSONVILLE State: MI Zip Code : 48419	Compliance Status : Compliance
Source Class : MAJOR	Staff : Gina McCann
FCE Begin Date : 4/1/2013	FCE Completion Date : 3/24/2015
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/23/2015	Scheduled Inspection	Compliance	Inspection to determine compliance with MI-ROP-N6007-2012, NSPS WWW and MACT AAAA.
03/20/2015	MACT (Part 63)	Compliance	Semi-annual SSM report. (4) GCCS startup events occurred, all consistent with plan, (1) GCCS shutdown event occurred, consistent with plan, (4) GCCS malfunctions occurred, consistent with plan. Revisions to the plan were made during this reporting period. glm
03/20/2015	ROP Annual Cert	Compliance	Annual cert. Well 08 exhibited >5% O2 due to iced test port in Feb., compliant in March. New site technician did not re-check within appropriate time frame, alt timeline submitted and declined. EUOPENFLARE-multiple times when flare was inoperable, due to power outage. New flare to be installed sometime in 2015. glm

Activity Date	Activity Type	Compliance Status	Comments
03/20/2015	ROP SEMI 2 CERT	Compliance	Semi annual cert. EUOPENFLARE-(24) instances when there was inaccurate or no flow, suspected software glitches, not a deviation but reportable. TRIC0014-12/15/2014 O2=0, static=0 resolved; TRIC017R-O2 out of compliance for 4 days and then 7 days. Flare not in operation on 7/7/14 (10.6 hours) due to power outage, 7/30/14 (4.5 hours) due to power outage, 12/2/14 (70 hours) blower bearings went out, repaired blower. glm
03/20/2015	NSPS (Part 60)	Compliance	Semi annual NSPS. EUOPENFLARE-(24) instances when there was inaccurate or no flow, suspected software glitches, not a deviation but reportable. TRIC0014-12/15/2014 O2=0, static=0 resolved; TRIC017R-O2 out of compliance for 4 days and then 7 days. Flare not in operation on 7/7/14 (10.6 hours) due to power outage, 7/30/14 (4.5 hours) due to power outage, 12/2/14 (70 hours) blower bearings went out, repaired blower. glm
03/20/2015	MAERS	Compliance	MAERS report was received on 3/10/2015. glm
10/14/2014	ROP Semi 1 Cert	Compliance	Deviations= Well 08 out of compliance, well not retested within 5 days then 15 days of initial exceedance, Alt timeline request denied letter dated 7/8/14. Reported flare outages, due to power failures-not deviations, but reportable. glm
10/14/2014	MACT (Part 63)	Compliance	Semi Annual NSPS report to comply with MACT AAAA. Deviations= Well 08 out of compliance, well not retested within 5 days or 15 days of initial exceedance, Alt timeline request denied letter dated 7/8/14. glm
07/30/2014	ROP Other	Non Compliance	4/25/14 EW08 O2 exceedance, re-monitored May 19, 2014 and again June 6, 2014. Exceedance continued for 56 days. New well technician, lack of communication. Well camera sent down no liquid, replaced well head replaced-returned to compliance. glm

Activity Date	Activity Type	Compliance Status	Comments
03/20/2014	ROP Other	Compliance	9 GCCS startup events, consistent with the SSM Plan. 2 GCCS shutdown events occurred, consistent with the SSM Plan. No revisions were made to the SSM Plan. glm
03/20/2014	MACT (Part 63)	Compliance	MACT AAAA semi-annual reporting. HZ001 exhibited O2 concentration in excess of 5% for 35 days, HOV approved on 12/11/2014. Flare not operational >1 hour, Power Outage 7/08/2013 (3.9 hrs.), 7/10/2013 (6.4 hrs.), 7/19/2013 (3.9 hrs.), and 11/17/2013 (15.0 hrs.). Nitrogen Tank empty 8/04/2013(11.3 hrs.) and replaced, down 10/08/2013 for maintenance (1.6 hrs.). glm
03/19/2014	ROP Annual Cert	Compliance	Annual Compliance Certification. Semi-Annual NSPS Report. HZ001 exhibited O2 concentration in excess of 5% for 35 days, HOV approved on 12/11/2014. Flare not operational >1 hour, Power Outage 7/08/2013 (3.9 hrs.), 7/10/2013 (6.4 hrs.), 7/19/2013 (3.9 hrs.), and 11/17/2013 (15.0 hrs.). Nitrogen Tank empty 8/04/2013(11.3 hrs.) and replaced, down 10/08/2013 for maintenance (1.6 hrs.). glm
03/19/2014	ROP SEMI 2 CERT	Compliance	Semi-Annual Report Certification
03/19/2014	NSPS (Part 60)	Compliance	Semi-Annual NSPS Report. HZ001 exhibited O2 concentration in excess of 5% for 35 days, HOV approved on 12/11/2014. Flare not operational >1 hour, Power Outage 7/08/2013 (3.9 hrs.), 7/10/2013 (6.4 hrs.), 7/19/2013 (3.9 hrs.), and 11/17/2013 (15.0 hrs.). Nitrogen Tank empty 8/04/2013(11.3 hrs.) and replaced, down 10/08/2013 for maintenance (1.6 hrs.). glm
09/16/2013	ROP Semi 1 Cert	Compliance	No deviations to report.
09/16/2013	NSPS (Part 60)	Compliance	Semi-annual NSPS report. 4 instances when the flare downtime were greater than 1 hour, due to power outage. Not deviations, but reportable under 60.757(f)(3). Actions taken according to SSM.
09/16/2013	MACT (Part 63)	Compliance	Semi-annual SSM report. 6 GCCS startup events due to power outage, actions taken according to SSM Plan.

Activity Date	Activity Type	Compliance Status	Comments
04/04/2013	Malfunction Abatement Plan	Compliance	Request MAP for Flare.. Response Due May 4, 2013
04/01/2013	Other	Compliance	Review pilot flame records for deviations reported in Annual Cert report received January 2012 for Part 63 Subpart AAAA & Part 60 Suppart WWW control device monitoring & records compliance demonstration for flare. MAP shall be requested for flare as several equipment failures since 2010.

Name: *Michael P. [Signature]* Date: 3/31/15 Supervisor: *C. [Signature]*  
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