## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## **ACTIVITY REPORT: Scheduled Inspection**

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FACILITY: BREITBURN OPER	RATING LP- C. S. & C.S. North CPF	SRN / ID: N6118				
LOCATION: SW14 SW14 SEC	29, CHARLTON TWP	DISTRICT: Cadillac				
CITY: CHARLTON TWP	7.1.V	COUNTY: OTSEGO				
CONTACT: Carolann Knapp,	Environmental Specialist	ACTIVITY DATE: 12/02/2015				
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT				
SUBJECT: Scheduled inspection of this opt out source.						
RESOLVED COMPLAINTS:						

Inspected this opt out source per permit to install number 676-96. Prior to entering the facility, no odors or visible emissions were noted. GPS Coordinates, 45.0445, 84.4671.

An inventory of on-site equipment was taken:

- -One V-12 Caterpillar Engine, Model 398TA, with catalytic control
- -Two exempt AST's (both 400 bbl)
- -One small glycol dehydrator

Following are the findings of the inspection by permit special condition. All required records were reviewed and some are attached to this report.

- 13. Carbon Monoxide, VOC, and NOx emissions from the whole facility are not to exceed 89 tons per year based on a 12-month rolling time period. Records provided from the company indicate that emissions for the facility were 0.5 tpy for CO, 1.3 tpy, for VOC, and 3.9 tpy for NOx based on a 12-month rolling time period for the months October 2014 through October 2015.
- 14. HAPS emissions from the facility are not to exceed 9 tons per year on any individual HAP not 22.5 tons per year for total HAPS. Records provided from the company indicate that emissions for the facility were 0.0 tpy for any individual HAP and 0.0 tpy for all HAPS based on a 12-month rolling time period for the months October 2014 through October 2015.
- 15. The facility is required to complete emissions calculations for regulated pollutants. Emissions calculations for the regulated pollutants listed in items 13 and 14 above appear to have been completed in a correct and timely manner.
- 16. The facility is required to keep records of the following:
  - -Fuel Consumption
  - -Crude/Condensate throughput
  - -Monthly hydrocarbon liquid trucked not applicable for this facility, no loadout
  - -Glycol circulated through the dehy

These records are being kept, appear complete, and were available upon request.

- 17. The facility is required to keep records of oil and gas processed. These records are being kept, appear complete, and were available upon request.
- 18. The facility is required to submit MAERS reporting. This reporting was completed in a timely manner. Please see MACES for more details.
- 19. The facility is required to keep records of maintenance activities. These records are being kept, appear complete, and were available upon request. Pursuant to a Departmental letter dated November 21, 2006, any facility receiving a MOGA permit and operating an engine with control, which includes this facility, is required to have a MAP for the controlled engine. This facility does not have a MAP in place. On January 5, 2016, a MAP for the engine was requested.
- 20. AST capacity at the facility is limited to 952 barrels, the capacity of all AST's on site are below this threshold.

- 21. The facility is required to keep any records of control equipment bypass. The equipment was not bypassed at any time in the last 12 months. It was noted on site that the catalyst inlet temperature was 816 F and the outlet was 847 F. A review of records taken on site indicated a consistent rise in temperature across the catalyst bed. This is an indication that the catalyst bed is operating.
- 22. This facility is currently not subject to 40 CFR 60 Subpart KKK
- 23. No stack testing has been required to be performed at this facility in the last 12 months and is not recommended at this time.
- 24. The facility is required to process only sweet natural gas. Natural gas sent to this facility is pulled only from "sweet" formations.

At the time of the inspection, this facility was in compliance with applicable air permitting and regulations.

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DATE 1422/15 SUPERVISOR