

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N612031073

FACILITY: BREITBURN OPERATING LP - PEGGY FLEMING		SRN / ID: N6120
LOCATION: SEC 5 T31N R4W NW, SW, SW, ELMIRA TWP		DISTRICT: Gaylord
CITY: ELMIRA TWP		COUNTY: OTSEGO
CONTACT: Carolann Knapp , Environmental Specialist		ACTIVITY DATE: 09/09/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE		
RESOLVED COMPLAINTS:		

SRN: N6120, Breitburn's Peggy Fleming CPF

Directions. The facility is located in Otsego County, Elmira Township. From M-32 turn north on Camp Ten Road, turn west on Theisen Road, at the T-in-the-road turn north onto Webster Road and travel about a mile, the facility is on the east side of the road.

Application. This is an Antrim gas facility and includes one Caterpillar 399 TA rich-burn compressor engine (830 hp) and one glycol dehydration system with a 125,000 Btu/hr gas-fired reboiler burner. The application describes the facility as a minor for HAPs.

Permit. On April 27, 2005 the AQD issued opt-out permit 289-01A.

Malfunction Abatement Plan (MAP). On April 4, 2007 the AQD received a MAP for the facility. The MAP file does not have an AQD approval letter. There is no objection to the

MAP. The MAP includes one Caterpillar 399 TA engine with catalytic converter control, and no AFRC. The permittee keeps records of engine catalyst inlet and outlet temperatures as required by the MAP.

MAERS. EUENGINE, CO and NOx Emission Basis is marked "Other." The attachment includes the Caterpillar spec sheet, but does not include the calculation. The 2014 MAERS reported EUENGINE emissions of:

- CO 5.26 tons (16.3 tpy permitted),
- NOx 6.69 tons (22.9 tpy permitted).

Records. Records were provided including the NOx and CO emissions on a monthly and 12-month rolling basis. NOx and CO emissions are below the permitted level. The records do not include the calculation. As a general statement, Breitburn uses the engine manufacturer (Waukesha, Caterpillar) emission factors spec sheet for calculating the monthly and 12-month rolling emissions.

MACTS. The facility is minor for HAPs making the facility an area source for these MACTS:

- 40 CFR, Part 63, Subpart ZZZZ,
- 40 CFR, Part 63, Subpart HH.

The EPA has not delegated these subparts to MI AQD and the Subparts were not reviewed.

MACES. Facility Information and Regulatory Information were reviewed and no change was made.

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection notes via email.

Compliance. A review of MACES report generator shows no outstanding violation.

Inspection. On September 9, 2015 Torello/AQD staff visited the site. At this geographic location are three CPFs including:

- Breitburn's SRN N6120 (the north-west building)
 - Peggy Flemming CPF; and

- Chevron MI LLC's SRN N7022
 - Elmira Thrive West CPF (directly behind Peggy Flemming), and
 - Warner 2 CPF.

Torello will recommend putting these two SRNs, N6120 and N7022, on the same inspection rotation because they are at the same geographic location.

There is a fence in place, and there are hazard/cautions signs on the fence and on the buildings within the fenced area. Upon arrival the fence gate was closed and locked. Rob from Breitburn arrived on site and showed AQD staff the facility.

The engine was operating. There were no visible emissions observed from the engine stack. By visual assessment, the engine stack meets the permitted limits of a maximum of 16 inches in diameter and a minimum 30 feet in height. The engine has a catalytic converter. Clip boards in the engine building include records of engine catalyst inlet and outlet temperatures: outlet temperatures were greater than inlet temperatures. During the site visit, AQD staff recorded from the monitor: Pre Cat 925 degrees F / Post Cat 947 degrees F. There is a second clip board recording engine operating variables, and maintenance.

Rob said the Iron Sponge on site treats gas before the gas goes to the glycol dehydrator. From the gly dehy the gas then goes to the sales line. Spring 2015 was the last time the Iron Sponge media was changed.

There are two large tanks in a lined retaining area. There was standing water in the retaining area.

Permit Conditions: Records show the NOx and CO emissions are below the permitted limits. There is a MAP on file for the facility. Records show the engine operated less than 200 hours per year without the control device operating. AQD has not requested testing. Natural gas throughput is recorded-the permit does not limit gas throughput.

There is a log of maintenance activities. The stack diameter and height restrictions are met. This is an Antrim facility and sweet gas is burned at the facility.

Conclusions:

Torello recommends putting SRNs N6120 and N7022 on the same inspection rotation because they are at the same geographic location.

Via onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 289-01A.

NAME Gloria Torello

DATE 9-10-15

SUPERVISOR 

