

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

N612126995

FACILITY: BREITBURN OPERATING LP- CHARLTON EAST		SRN / ID: N6121
LOCATION: NE NW NE SEC 3 T29N R1W, CHARLTON TWP		DISTRICT: Cadillac
CITY: CHARLTON TWP		COUNTY: OTSEGO
CONTACT: Carolann Knapp , Environmental Specialist		ACTIVITY DATE: 09/12/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Friday, September 12, 2014, Caryn Owens of the DEQ-AQD conducted a scheduled on-site inspection of the Breitburn Operating, LP (Breitburn) – Charlton East facility (N6121) located in the northwest quarter, the northwest quarter, of the northeast quarter, of Section 3, T29N, R1W in Charlton Township, Otsego County, Michigan. More specifically, the site is located off a two-track from Bear Lake Road, located approximately ½ mile north of Old State Road and Bear Lake Road intersection. Travel the two-track northwest approximately 1.6 miles, and the site is on the east side of the two-track. The purpose of this inspection was to determine the facility's compliance with permit to install (PTI) 679-96. The site is currently an area source that has opted out of being a major source by limiting the operational and/or production limits potential to emit (PTE) to be below the major source thresholds. DEQ was unaccompanied during the field inspection, an inspection brochure was not given to anyone at this facility. The site is an area source for National Emission Standards for Hazardous Air Pollutants (NESHAP) Part 63 Subpart HH, and NESHAP Part 63 Subpart ZZZZ. The State of Michigan does not have delegated authority of the area source NESHAPs, and thus these areas were not reviewed by the MDEQ, but possibly by the EPA. The weather was cloudy, about 50°F, with calm easterly winds.

The equipment at the site consisted one 400-barrel storage tank and a building with two compressor engines, a glycol dehydrator system, and three vertical separators. The glycol dehydrator was used to dry the field gas prior to transporting it to the sales line. DEQ observed a steam plume from the glycol dehydrator flash tank stack, and a heat shimmer from the glycol dehydrator burner stack. The glycol dehydrator flash tank and burner stack were approximately 20 feet above ground surface. The east compressor engine was not operating at the time of the inspection, and the control box was partially disassembled. The northern compressor engine was operating at 1106 RPM and 60 psi, and was equipped with a catalytic converter and AFRC. The pre-catalyst temperature was 1033°F and the post-catalyst temperature was 1066°F. The engine block was labeled GCS-803, and the engine was an 830 horsepower CAT 399TA, serial number 49C3680. The stack on the compressor engine contained a muffler and was approximately 20 feet above ground surface, no other visible emissions were observed from the compressor engine stack. No odors were present during the inspection.

### Records Reviewed

**Emission Limits:** In reference to Special Conditions (SC): 13 and 14, the facility is limited to no more than 89 tons per 12-month rolling time period of carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOCs), and no more than 9 tons per 12-month rolling time period for a single hazardous air pollutant (HAP) and no more than 22.5 tons per 12-month rolling time period for all HAPs. Based on the records reviewed, no HAP emissions were present, the highest emissions between August 2013 through August 2014 was 9.7 tons per 12-month rolling time period for CO, 12.3 tons per tons per 12-month rolling time period for NOx, and 2.4 tons per 12-month rolling time period for VOCs (which includes the VOCs emitted from the glycol dehydrator). The emissions are compliant with the permitted limits.

**Materials/Fuels:** Based on the records reviewed, this site can either use fuel from a rich burn fuel or low emission fuel source. From August 2013 to August 2014, no rich burn fuel was used, which means the engine was not operated without the catalytic converter within this time period. The low emission fuel ranged between 3.11 to 4.07 mmscf per month, which was using the engine with the catalytic converter. The facility draws oil and gas from the Antrim formation at this location.

**Process/Operational Parameters:** In reference to SC: 19, the facility must maintain maintenance logs to verify the engine is maintained and operating properly. Based on the records reviewed, the engine did not operate without the catalytic converter from August 2013 to August 2014. According to SC: 21, the engine

is allowed up to 48 hours per event, or 144 hours per calendar year to operate without the catalytic converter. During the inspection, DEQ observed a maintenance logs filled out with the daily engine parameters recorded. Based on the records reviewed, oil was not stored in the above ground storage tank from August 2013 through August 2014.

**Testing Sampling Equipment:** In reference to SC: 15 and SC: 23, Breitburn used engine specific emission factors to calculate the emissions for CO, NOx, and VOCs. Performance testing has not been completed at this facility.

**Monitoring/Recordkeeping:** In reference to SC: 16, the facility monitors the monthly fuel consumption (which is previously discussed in Materials/Fuels above), monthly crude/condensate throughput to onsite storage tanks in barrels, monthly hydrocarbon liquid trucked, and the glycol circulated through the dehydrator in gallons per minute (gpm). There was no tank throughput or crude oil trucked from August 2013 through 2013. The glycol recirculation rate was 0.25 gpm.

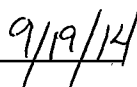
**Reporting:** In reference to SC: 18 and facility reports annual emissions to the DEQ. Based on the most recent Michigan Air Emissions Reporting System (MAERS), the facility was in compliance.

**Evaluation Summary:** Based on the field inspection and records review, the facility is in compliance with PTI 679-96, and no further actions are necessary at this time.

NAME



DATE



SUPERVISOR

