

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

N614245408

FACILITY: TRENDWELL ANTRIM INC - VIENNA 20		SRN / ID: N6142
LOCATION: SE NW NW T30N R1E SEC 20, VIENNA TWP		DISTRICT: Gaylord
CITY: VIENNA TWP		COUNTY: MONTMORENCY
CONTACT: Danita Greene , Production and Environmental Compliance		
STAFF: Becky Radulski		ACTIVITY DATE: 06/28/2018
COMPLIANCE STATUS: Compliance		SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection		
RESOLVED COMPLAINTS:		

AQD Staff traveled to N6142 Trendwell Vienna 20 Central Production Facility (CPF) located in Vienna Township, Montmorency County, for a scheduled inspection to determine compliance with PTI 700-96B. This is an opt out permit.

The Vienna 20 CPF is a natural gas production facility, extracting gas from the Antrim formation. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by two engines, and water is removed by a glycol dehydrator.

LOCATION

The facility is located between Johannesburg and Atlanta. From Johannesburg, travel east on M-32 to Matthews Road. Go north on Matthews Road approximately ¾ miles, the dirt access road will be on the east side of the road. Two dirt driveways are adjacent each other – the access road is the north driveway. The site is not visible from the road. There is no gate. A map is attached.

REGULATORY DISCUSSION

PTI 700-96B was issued February 7, 2012, voiding prior permit 700-96A. The permit was updated in 2012 to reflect replacing a previously permitted Caterpillar 3516LE with two engines – a Caterpillar 3512LE and Caterpillar 398 with catalytic control.

PTI 700-96A was issued 9/26/2007, voided 2/7/12.

PTI 700-96 was issued 11/14/96, voided 10/4/2007.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

INSPECTION NOTES

The source consists of one large building containing two engines, a tank farm with two tanks, a glycol dehydrator and a meter building. The doors to the compressor building were open. The engines were loud, there are residents along Matthews Road.

The two engines were operating during the inspection. No visible emissions or odors were detected. Several drums and small tanks containing oil and used oil are located inside the building.

EUENGINE1, the east engine, is a Caterpillar 3512 LE, identified as 902 on the skid. The engine was operating at 1152 RPM, 52 psi engine oil pressure. The stack visually appeared to meet the permitted stack height and diameter of 34.5 feet and 12.2 inches, respectively. The stack had a muffler and discharged unobstructed vertically upwards.

EUENGINE2, the west engine, is a Caterpillar 398NA, identified on the clipboard as Unit 944 (no visible marking on skid). The engine was operating at 924 RPM, 60 psi engine oil pressure. The engine has a catalytic convertor. The inlet temperature to the catalytic convertor was 867 degrees Fahrenheit, while

the outlet was 968 degrees Fahrenheit. These temperatures are within the range established in the Malfunction Abatement Plan. The stack visually appeared to meet the permitted stack height and diameter of 34.5 feet and 5.1 inches, respectively. The stack had a muffler and discharged unobstructed vertically upwards.

A bermed, lined tank farm is located to the east of the building. Two tanks (1 400 barrel tank, 1 200 barrel tank) are within the containment. The tanks are not labeled.

The glycol dehydrator is located south of the compressor building. The unit was emitting steam, light odor detected. A 55 gallon drum of triethylene glycol was located in containment next to the dehy unit.

A meter building is located south of the tank farm. A contained drum, approximately 25 gallons, of Methanol is located next to the meter building.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, N6144 Trendwell Vienna 20 CPF appears to be in compliance with PTI 700-96B. Records were reviewed separately.

NAME Becky Radulski

DATE 8/2/18

SUPERVISOR SN

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other**

N614245407

FACILITY: TRENDWELL ANTRIM INC - VIENNA 20		SRN / ID: N6142
LOCATION: SE NW NW T30N R1E SEC 20, VIENNA TWP		DISTRICT: Gaylord
CITY: VIENNA TWP		COUNTY: MONTMORENCY
CONTACT: Danita Greene , Production and Environmental Compliance		ACTIVITY DATE: 06/05/2018
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: records review		
RESOLVED COMPLAINTS:		

RECORDS REVIEW OF PTI 700-96B FOR N6142 TRENDWELL VIENNA 20 CPF.

FGENGINES

SC I.1, VI.6 – limits EUENGINE1 Nitrogen Oxides (NOx) to 20 tpy, based on 12 month rolling. Records were provided – NOx emissions for February 2018 were 0.79 tons, and 10.22 tpy based on 12 month rolling. These emissions are below the permitted limit.

SC I.2, VI.7 – limits EUENGINE1 Carbon Monoxide (CO) to 13 tpy, based on 12 month rolling. Records were provided – CO emissions for February 2018 were 0.41 tons, and 5.27 tpy based on 12 month rolling. These emissions are below the permitted limit.

SC I.3, VI.6 – limits EUENGINE2 NOx to 6 tpy, based on 7 month rolling. Records were provided – NOx emissions for February 2018 were 0.24 tons, and 3.13 tpy based on 12 month rolling. These emissions are below the permitted limit.

SC I.4, VI.7 – limits EUENGINE2 CO to 2 tpy, based on 14 month rolling. Records were provided – CO emissions for February 2018 were 0.51 tons, and 6.75 tpy based on 12 month rolling. These emissions are below the permitted limit.

SC III.1, VI.3 – requires a preventative maintenance/malfunction abatement plan (PM/MAP). The facility has a PM/MAP dated March 2016 on file. The facility provided records as requested. The records were reviewed and determine to meet this condition.

SC III.2, IV.1, VI.4 – requires an engine equipped with add-on control device to not operate without that control device for more than 200 hours. The source provided documents showing hours of operation per month. The data shows that the engine and control were both down for the same number of hours each month, or zero hours of engine operation without control.

SC III.3 – requires the source to comply with 40 CFR Part 63, Subpart ZZZZ. This regulation has not been delegated to MDEQ from EPA, therefore the facility will demonstrate compliance to EPA as required.

SC IV.2, VI.2, VI.5 – require the facility to monitor and record the natural gas usage for each engine. Records were requested and provided on monthly and 12 month rolling basis (for February 2018, monthly was 4282 mcf, 55937 mcf 12 month rolling), thus meeting this condition.

SC V.1 – requires testing upon request of AQD District Supervisor. Testing is not being requested at this time.

SC VI.1 – requires records to be calculated and available to AQD by the 15th day of the calendar month. Records were available and provided as requested.

SC VII.1 – allows for engine swapout of equivalent or lesser emitting engines, provided notification is made to AQD. No notifications have been received, and the engines appear to be the same engines identified in the previous inspection.

SC VIII.1 – requires the exhaust gases to be emitted from a stack with a maximum diameter of 12.2 inches, minimum height of 34.5 feet, discharged unobstructed vertically upwards to ambient air. The stack was viewed during the onsite inspection – based on visual estimation, it appears to meet this condition.

SC VIII.2 – requires the exhaust gases to be emitted from a stack with a maximum diameter of 5.1 inches, minimum height of 34.5 feet, discharged unobstructed vertically upwards to ambient air. The stack was viewed during the onsite inspection – based on visual estimation, it appears to meet this condition.

MAERS

MAERS 2018 submittal was reviewed. See MAERS for details.

MACES

Information and Regulatory information was reviewed.

COMPLIANCE DETERMINATION

Based on the records review, N6142 Trendwell Vienna 20 CPF appears to be in compliance with records required in PTI 700-96B.

NAME Becky Radulski

DATE 8/2/18

SUPERVISOR JN