

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

N623331083

FACILITY: Merit Energy Company - Kalkaska F24 CPF		SRN / ID: N6233
LOCATION: SMITH LAKE RD, KALKASKA		DISTRICT: Gaylord
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT: Vicki Kniss , Regulatory Affairs		ACTIVITY DATE: 03/31/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE 2015		
RESOLVED COMPLAINTS:		

SRN: N6233, Merit Energy Company, Kalkaska F-24 CPF

Directions. The facility is located in Kalkaska County. From 131 turn west on Island Lake Road, turn south on Smith Lake Road, the facility is on the east side of the road. The facility is not well marked, and the access drive is approximately a quarter mile long. See the inside front cover of blue permit file 101-97 for a map to the site.

Application. This is a Niagaran gas facility ~~with~~ from the mid-1990s.

Permit. On February 21, 1997 the AQD issued opt-out permit 101-97. The permit limits NOx, CO, and VOC to 89 tpy per pollutant. This is a MOGA permit. Because the engine specific emission factors are used to calculate emissions, an updated Appendix A will not be requested.

This is a MOGA permit. Because the engine does not have control, a malfunction abatement plan will not be requested.

MAERS. The 2014 MAERS included:

- one 4-cycle Rich Burn uncontrolled internal combustion engine,
- one glycol dehydrator, and
- three fixed roof tanks.

The 2014 MAERS reported:

- CO 2.8 tons (89 tpy permitted),
- NOx 24.7 tons (89 tpy permitted),
- VOC 12.8 tons (89 tpy permitted).

MACTS. The permit limits HAPs to below 9 tpy for an individual HAP and below 22.5 tpy for total HAPs from the facility, making this facility minor for HAPs, and an area source for these MACTS:

- 40 CFR, Part 63, Subpart HH Oil and Natural Gas Production,
- 40 CFR, Part 63, Subpart ZZZZ, Reciprocating Internal Combustion Engines

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

MACES.

- Facility Information was reviewed and no change was made.
- Regulatory Info was updated.
 - TV PTI was updated to include CO and VOC as Synthetic Minor,
 - Subject To was updated to include 40 CFR Part 63 Subpart ZZZZ.

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. The facility is spread out over a large area, perhaps a few acres. There was noise from the engine indicating it was operating. The engine noise was so loud AQD staff called Vicki Kniss of Merit and left a message about the noise. Later Vicki called back and left a message indicating the noise is normal for the Ajax engine/muffler. No visible emissions from the engine were observed. The tank battery has 4 tanks with VRU. The tanks hook-up for unloading has a retaining area. Additionally there is a single tank out of the retaining area and this tank has a pipe extending skyward and no VRU. There are three in-line heaters, one appeared to be new. The site has a collection of equipment that appears to be non-functional, rusting and on the ground.

Tom Heller of Merit staff, 231-590-3113; communicated in a September 11, 2015 telephone message the facility sells approximately 3-5 MCF of gas per day. The well's submersible pump is bad, but with the price of fuel there are no immediate plans to repair the pump. The facility will likely not run this coming winter.

Permit Conditions and Records review.

The submitted and reviewed records include:

- Fuel usage on a monthly and 12-month rolling basis (the permit does not limit fuel usage),
- NO_x, CO, VOC, and HAPs emissions on a monthly and 12-month rolling basis (records show reported emissions below the permitted limits),
- Niagaran emission factors in the emission calculations,
- Maintenance.

The records demonstrate compliance with emission limits.

The facility that does not fractionate mixed natural gas liquids into natural gas products and the facility is not subject to 40 CFR Part 60 Subpart KKK.

AQD has not requested testing. A 2014 Certificate of Analysis of gas at the DEHY INLET shows the gas is ND (non-detect) for Hydrogen Sulfide-the permit requires only sweet natural gas be processed at the facility.

Conclusions. Via onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 101-97.

NAME Gloria Inella

DATE 9-16-15

SUPERVISOR 

