

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

N746323578

FACILITY: BREITBURN OPERATING LP - ELMER FUDD EAST		SRN / ID: N7463
LOCATION: SEC 07 T28N R03E NE SE, COMINS		DISTRICT: Gaylord
CITY: COMINS		COUNTY: OSCODA
CONTACT: Carolann Knapp		ACTIVITY DATE: 11/06/2013
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Fiscal Year 2014 Site Inspection.		
RESOLVED COMPLAINTS:		

Directions to the site: M-33 to Boiling Springs Road. The facility is north of Hill Road, on the east site of Boiling Springs Road. A map to the site is stapled to the inside of the yellow ROP file.

This Title V subject Breitburn central production facility (cpf) processes natural gas from Antrim wells and serves to dehydrate and compress the gas prior to the gas's pipeline transport. Sour gas is not produced at this cpf. The onsite equipment includes three natural gas fired reciprocating engines, a glycol dehydration system, and methanol storage equipment. The ROP was last renewed August 20, 2008. On February 22, 2012 the AQD sent Breitburn the reminder letter of the need to renew the ROP. On January 31, 2013 Breitburn submitted the renewal application. Bill Rogers of AQD staff is rewriting the ROP, which will go on 30-day public notice starting December 30, 2013.

The three natural gas-fueled engines are subject to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines for Area Sources promulgated in 40 CFR, Part 63, Subparts A and ZZZZ.

The glycol dehydration system is subject to the National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities for Area Sources promulgated in 40 CFR, Part 63, Subparts A and HH.

No emission units are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64.

On November 6, 2013 Gloria Torello and Becky Radulski of AQD met Ron from Breitburn at the facility. Ron has responsibilities for running the engines.

On site are three Caterpillar 3516 natural gas fired lean burn 1265 horsepower engines. All three engines operated during the site visit. No visible emissions or odors were noted from the engines. The engines do not have a catalytic converter. The engine stacks looked to be at least 39 feet above ground level and no more than 16 inches in diameter. The engines have air/fuel ratio control (AFRC). Clipboards on the engine control panel show records including gas pressure, gas temperature, flow rate MMCFD.

The one glycol dehydrator on site serves all the engines. The glycol dehydrator operated during the site visit. No odors were noted from the glycol dehydrator during this site visit.

The tank battery is lined with a black pit liner.

Each engine has an AFRC. The malfunction abatement plan (MAP) includes the AFRC. No engine has a catalytic converter.

The permittee's records are up to date. Any issue with a record would be addressed at the time of review.

The special conditions (SC) of the ROP are discussed below.

Source-Wide

SC I.1. Records show the sum of NOx emissions from all engines is below the source wide limit of 136 tpy. MAERS 2012 report 79.4 tons NOx sourcewide.

SC 1.2. Records show the sum of ^{CO}SO₂ emissions from all engines is below the source wide limit of 98.7 tpy. MAERS 2012 report 57.9 tons ^{CO}SO₂ sourcewide.

SC V.1. AQD did not request the verification of H₂S.

SC VI.1. The permittee keeps monthly and 12-month rolling CO and NOx emission calculations records.

EUDEHY

SC III.1. The facility is subject to 40 CFR Part 63 Subpart HHH. All indications are the facility is in compliance with the requirements of the subpart.

FGENGINES

SC I.1. Records show each individual engine has NOx emissions below the permitted 45.3 tpy. MAERS 2012 reported NOx emissions as follows: Engine 1 had 25.7 tons, Engine 2 had 28 tons, Engine 3 had 25.6 tons.

SC 1.2. Records show each individual engine has ^{CO}SO₂ emissions below the permitted 32.8 tpy.

SC III.1. The AQD approved the MAP on April 24, 2007.

SC. III.2 and 3. The engines do not have add-on control, these conditions are not applicable.

SC V.1. On September 9, 2009 the AQD received the test results required by this condition. A review of the results show there was no AQD objection to the test results.

SC VI.1 Natural gas usage is monitored and recorded.

SC VI.2. There is a log of maintenance activities for the MAP activities.

SC VI.3. The engines do not have add-on control, the condition is not applicable.

SC VI.4. Monthly fuel use records are kept. The permit does not limit fuel use.

SC VI.5 and 6. NOx and CO records are kept on a monthly and 12-month rolling basis.

SC VIII. 1, 2 and 3. Per a visual estimate, the stacks meet the permit requirements.

SC IX.1. The facility is not subject to CAM.

MAP

Records show on-going engine maintenance. The engines are lean burn and do not have control. Per telephone conversation with Carolann at Breitburn, an AFRC has a sensor that lets the permittee know how much life is left in the AFRC. An AFRC is changed when the sensor indicates it needs to be changed.

NAME *Genie Ivello*

DATE *12-23-13*

SUPERVISOR 

