

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

N746729773

FACILITY: BREITBURN OPERATING LP - HUNT N HAYES		SRN / ID: N7467
LOCATION: SEC 34 31N 03E SW NE NW, ATLANTA		DISTRICT: Gaylord
CITY: ATLANTA		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 06/09/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection and Record Review		
RESOLVED COMPLAINTS:		

On June 9, 2015, I inspected the Hunt-N-Hayes CPF. I did not find any violations of air quality rules or Permit 238-05.

Reporting and the Malfunction Abatement Plan for this facility claimed that it was a lean burn engine with no catalytic oxidizer. That is what I found when I arrived on site.

The facility includes two 400-barrel size tanks. They are piped to a well labeled Permit #48805, Keetch A2 -34 SWD, SW/4 NE/4 NW/4 Sec 34, 31N-03E Hillman Twp Montmorency Co, In Case of Emergency 989-732 -0869. The "SWD" in the well description stands for salt water disposal. This makes it appear the tanks are brine tanks. The tanks lack truck load-out capability which is also consistent with brine tanks. They are located inside a lined berm which appears to be in good condition.

The compressor shed has two tall stacks, one for the engine and one for the dehy burner. Both exhaust unobstructed vertically upward. The shed is equipped with a three color hazard light set; the green light was on at the time of my inspection.

The engine stack has a maximum diameter of 16 inches and a minimum exhaust height of 36 feet according to Special Condition 1.13 of Permit 238-05. Judging by eye, the stack appeared to meet these requirements. There was no opacity from this stack.

The dehy stack appeared to be 6 to 8 inches in diameter and perhaps 30 feet tall. The permit doesn't contain any required dimensions for this stack. There was no opacity.

The dehydrator burner has a Wenco Flame Arrested Burner with capacity of 250,000 BTU (presumably BTU per hour) according to its builder's plate. There are two glycol vents which are iron pipes of about 1 1/2 inch diameter, capped with "tees." I saw wisps of "steam" coming from these vents. I smelled moderate glycol odors in the area, but nothing that should cause a problem off site.

The compressor engine is a medium sized Caterpillar engine. It has no catalytic oxidizer. According to its digital control box it was running at 1202 RPM, 27 volts, oil pressure 50 PSI, coolant temperature 202 degrees f.

I noted several small tanks or drums. One oval steel tank near the engine radiator was probably engine coolant. There was a drum-on-stilts type tank for triethylene glycol and another for methanol. There was one 300 gallon size drum on stilts tank near the engine which appeared to be engine oil.

Maintenance appeared to be good.

The company provided me with records to review for this facility.

Permit 238-05, Table EUENGINE, Special Condition 1.8, requires maintaining a maintenance log as specified in a Malfunction Abatement Plan. A copy of this log is attached.

Condition 1.9 requires keeping track of any hours operating without the installed control device, if applicable. There is no add-on control device, so this condition is not applicable.

Condition 1.10 requires monthly fuel use records for the engine. These are being kept. Fuel use for May was 5.3 MMCF.

Condition 1.11 requires monthly and 12-month NOx emission estimates. These were provided. For May, NOx was 2.84 tons/month and 33.2 tons/12 months. Permit limit is 45.4 tons/12 months.

Condition 1.12 requires monthly and 12 month CO emission estimates. These were provided. For May, CO was 2.06 tons/month and 24.1 tons/12 months. Permit limit is 33.4 tons/12 months.

Table FGFACILITY, condition 2.5, requires monthly and 12 month NOx and CO records. These records were provided. The vast bulk of the emissions come from the engine; total facility NOx is listed as 2.8 tons/month and 33.3 tons/12 months for May, vs. 2.8 tons/month and 33.2 tons/12 months for the engine alone. Facility CO was 2.1 tons/month and 24.2 tons/12 months vs. 2.06 tons/month and 24.1 tons/12 months for the engine alone.

Breitburn has elected to show compliance with NSPS HH by tracking the volume of gas processed through the dehydrator. They state that daily average gas throughput was 1,584 MSCF. This is about 44,853 scm. The dehydrator is exempt from the more stringent control requirements of NSPS HH because these apply only if average throughput is 85,000 scm or more per day.

NAME William J Rogers Jr.

DATE 6/12/2015

SUPERVISOR 