

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

N752529646

FACILITY: BREITBURN OPERATING LP-Minke Coat		SRN / ID: N7525
LOCATION: T29N R6E SECTION 1, ALPENA		DISTRICT: Gaylord
CITY: ALPENA		COUNTY: ALPENA
CONTACT: Carolann Knapp , BreitBurn Management		ACTIVITY DATE: 05/07/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 Inspection.		
RESOLVED COMPLAINTS:		

Directions. The facility is located in Alpena County in SE4, NW4, SE4, Section 1, T29N, R6E. From M-65 turn east on Beaver Lake Road, then south on Briar Hill Road, then east on Kanarr Road, then north on Herron Road. The facility is on the west side.

Application. This 2005 application for an Antrim gas CPF included:

- one Cat 3516 TALE,
- a glycol dehydration system,
- two 400-barrel brine storage tanks, and
- one 300-gallon methanol storage tank.

Permit. On March 28, 2006 the AQD issued opt-out permit 244-05. The permit includes:

- one natural gas fired reciprocating engine, and a
- glycol dehydration system.

MAP. On August 9, 2007 AQD approved the malfunction abatement plan (MAP). The **MAP** includes:

- one Cat 3516 lean burn with no control and no AFRC.

MAERS. Breitburn uses the engine manufacturer (Waukesha, Caterpillar) emission factors spec sheet for calculating and recording the monthly and 12-month rolling emissions, unless the permit states emission factors from stack testing shall be used in the calculations. The 2014 MAERS included these facility wide emissions:

- 9.9 tons CO (33.4 tpy permitted for EUENGINE, and 89 tpy for FGFACILITY), and
- 21 tons NOx (45.4 tpy permitted for EUENGINE, and 89 tpy for FGFACILITY).

Records. Breitburn consistently maintains their records, and makes records available to AQD upon request. The records demonstrate compliance with the permit limits and MAP. The records included:

- Natural gas throughput,
- NOx and CO emission rates from EUENGINE, and FGFACILITY,
- Certificate of Analysis for the gas, and
- Compressor maintenance log.

MACTS. The engine is subject to 40 CFR Part 63 Subpart ZZZZ. The glycol dehydrator is subject to 40 CFR Part 63 Subpart HH. This is an area source (minor for HAPs). The EPA has not delegated Subparts ZZZZ and HH to MI AQD and the Subparts were not reviewed.

MACES' Facility Information and Regulatory Information were reviewed and updated as needed.

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. AQD staff met Mr. Rick Hopp, Breitburn, at the facility.

The engine operated during the site visit. The engine does not have a catalytic converter.

The building doors were open on the field side of the building. The engine stack visible emissions were less than five percent. By visual assessment the engine stack meets the permitted limits of a maximum of 16 inches in

diameter and minimum of 36 feet above grade. There are two large tanks in a lined retaining area-one of these tanks has the words "Hole-do not use" painted on the tank. There was an old tank cast off to the side, and one newer tank off to the side that appears to be a replacement tank. Clip boards on site contain records of engine operating parameters including: RPM, oil pressure, oil temperature, water pressure, water temperature, and suction pressure. A glycol dehydrator is on site. A semi-truck was parked off to the side.

Permit Conditions:

EUENGINE

SC 1.1a & b, 1.11. Records from the permittee and MAERS show 12-month rolling NOx emissions below the permitted limits.

SC 1.2, 1.3, 1.4, 1.8. The AQD approved a MAP for the facility.

SC 1.5. Breitburn submitted a Certificate of Analysis showing the gas has a hydrogen sulfide content of Non-Detect.

SC 1.6. Submitted records show natural gas usage is monitored and recorded. The permit does not limit natural gas throughput.

SC 1.7. Calculations are available to the AQD.

SC 1.9. Not applicable, the engines are not controlled.

SC 1.10. Fuel use records are kept.

SC 1.12.a & b. A visual estimate showed the muffler stacks dimensions comply with the permit conditions.

FGFACILITY

SC 2.1a. & b. Records from the permittee and MAERS show 12-month rolling NOx and CO emissions below the permitted 89 tpy.

SC 2.2, 2.3. Breitburn submitted a Certificate of Analysis showing the gas has a hydrogen sulfide content of Non-Detect.

SC 2.4, 2.5. Records are kept.

Conclusions. Via onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 244-05.

NAME Gloria Torello DATE 6-4-15 SUPERVISOR 