

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

N790130609

<b>FACILITY:</b> TRENDWELL ANTRIM INC - WOLF CREEK CPF		<b>SRN / ID:</b> N7901
<b>LOCATION:</b> NW NE SEC 20, CALEDONIA TWP		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> CALEDONIA TWP		<b>COUNTY:</b> ALCONA
<b>CONTACT:</b> Todd Mall ,		<b>ACTIVITY DATE:</b> 06/16/2015
<b>STAFF:</b> Becky Radulski	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> scheduled site inspection		
<b>RESOLVED COMPLAINTS:</b>		

On June 16, 2015 traveled to N7901 Trendwell Wolf Creek CPF located in Caledonia Township, Alcona County for an unannounced scheduled inspection to determine compliance with PTI 349-07. This is an opt-out source. Gloria Torello, AQD, was also present for the inspection.

DEQ Inspection brochures have been previously emailed to Trendwell.

### LOCATION

The source is located west of Hubbard Lake. From M-32, travel south on M-65, turn east onto Hubbard lake Trail and follow approximately 7 miles. Turn left/north onto Yukon Rd (private road, many signs at entrance), follow 1-2 miles. The source is located next to a Breitburn facility (N8070).

### EQUIPMENT ON SITE

The facility consists of 2 engines - a permitted Caterpillar 3406 engine with catalyst and a Caterpillar 3516, 1085 hp, lean burn engine.

Onsite there is a glycol dehydrator, a tank farm with 2 tanks under 400 bbl.

Next to the Trendwell facility is a Breitburn CPF (N8070). During the permitted phase it was determined that the two CPFs operate independently from each other, and even if the emissions from both sources were combined they would not be a Title V facility, therefore they are 2 sources.

Breitburn sends its brine to the Trendwell facility for disposal.

The permit was originally issued 1-11-08 with two engines - a Caterpillar 3306 with no control, and a Caterpillar 3516LE, no control. In 2009 Trendwell submitted a PTI application to change the Caterpillar 3306 to a Caterpillar 3406 with catalytic convertor. The application was voided per Jeremy Hoeh in AQD Permits and the change could be accomplished under the flexibility of SC 2.8, which allows for change out of equivalent or lesser emitting engines. Trendwell sent a notification letter 8 -18-09.

### REGULATORY DISCUSSION

PTI 349-07 is for 2 engines and a dehy.

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

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

### INSPECTION NOTES

During the inspection the Caterpillar 3516 engine was operating and the Caterpillar 3406 engine was not. No visible emissions or odors were noted.

The Caterpillar 3516 was operating at 965 RPM and had engine oil pressure of 55 PSI.

A glycol dehydrator, a tank farm with 2 tanks under 400 bbl, and several small storage tanks – used oil, engine oil are inside the building. A brine injection well is located onsite.

The stack for EUENGINE1 is required to have a minimum height of 42 feet and 4 inch maximum diameter, and EUENGINE2 a minimum height of 33 feet and 12 maximum diameter – based on visual observation, the stacks appear to meet this condition.

**MAERS**

MAERS have been reviewed, no issues. See MAERS for details.

**MACES**

MACES facility information screen was updated with current equipment information. The regulatory summary screen was also reviewed. The engines were noted as subject to Quad Z. Notations were added to include subject to HH.

**COMPLIANCE DETERMINATION**

Based on the scheduled inspection, the facility appears to be in compliance with PTI 349-07. Records were reviewed separately.

NAME Becky Radulski

DATE 9/18/15

SUPERVISOR 