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

#### N804139871

FACILITY: Riverside Energy Michigan, LLC - HELENA 25 CPF		SRN / ID: N8041
LOCATION: HELENA 25 CPF, ALDEN		DISTRICT: Cadillac
CITY: ALDEN		COUNTY: ANTRIM
CONTACT: Natalie Schrader, Technical Assistant		ACTIVITY DATE: 04/12/2017
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source.		
RESOLVED COMPLAINTS:		

Inspected this source per Permit to Install 183-08C. No odors or visible emissions were noted on site during the inspection. An inventory of pertinent equipment is as follows:

Engine 1, CAT 3516TA without catalytic controls, Unit 868 Engine 2, CAT 3406TA with catalytic controls, Unit 105 One small glycol dehy No AST's or heaters

Following are the findings of the inspection per permit Special Condition:

## EUDEHY

- I. EMISSION LIMITS -NA
- II. MATERIAL LIMITS -NA
- **III. PROCESS/OPERATIONAL RESTRICTIONS**
- 1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH. Pursuant to 40 CFR 63.764, as long as the facility processes less than 85,000 cubic meters per day based on an annual average, they are considered a small dehy unit and are exempt from the general requirements of this subpart.
- **IV. DESIGN/EQUIPMENT PARAMETERS -NA**
- V. TESTING/SAMPLING -NA
- VI. MONITORING/RECORDKEEPING
- 1. Natural gas flow rate to the dehy is limited to 85,000 cu. m. per day based on an annual average. Natural gas flow rate to the dehy is 1008 cu. meters per day based on an annual average. A sample of the records supporting this is attached.
- VII. REPORTING -NA
- VIII. STACK/VENT RESTRICTIONS -NA
- IX. OTHER REQUIREMENTS -NA

#### FGENGINES

I. EMISSION LIMITS

1. NOx emissions from EUENGINE1 are not to exceed 24 tpy based on 12-month rolling time period as determined at the end of each calendar month. Records indicate emissions from this engine are 19.94 tpy based on 12-month rolling time period as determined at the end of each calendar month as of March of 2017.

2. CO emissions from EUENGINE1 are not to exceed 33 tpy based on 12-month rolling time period as

determined at the end of each calendar month. Records indicate emissions from this engine are 18 tpy based on 12-month rolling time period as determined at the end of each calendar month as of March of 2017.

3. NOx emissions from EUENGINE2 are not to exceed 8.0 tpy based on 12-month rolling time period as determined at the end of each calendar month. Records indicate emissions from this engine are 0.83 tpy based on 12-month rolling time period as determined at the end of each calendar month as of March of 2017.

4. CO emission from EUENGINE2 are not to exceed 3 tpy based on 12-month rolling time period as determined at the end of each calendar month. Records indicate emissions from this engine are 2.12 tpy based on 12-month rolling time period as determined at the end of each calendar month as of March of 2017.

## II. MATERIAL LIMITS -NA

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

- 1. The engines must have an approved MAP. This MAP was received by the AQD on October 16, 2013 and was approved on October 22, 2013. Monitoring in the MAP includes pressure drop across the catalyst, temperature differential across the catalyst, compressor downtime, and compressor operating parameter monitoring. A sample of these records is attached.
- 2. The permittee shall not operate any engine equipped with an add-on control device for more than 200 hours per engine per year without that control device. Engine 2 is equipped with a catalyst. There are no records in the last 12 months of this engine operating without the control device attached.

### **IV. DESIGN/EQUIPMENT PARAMETERS**

- 1. The permittee shall not operate any engine that contains an add-on control device unless that device is installed, maintained, and operated in a satisfactory manner. Engine 2 is equipped with a catalyst. Engine testing dated 10/15/15 (report attached) indicates that the catalyst was working.
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the natural gas usage for each engine. Each engine is so equipped. Records of natural gas usage are being kept.

# V. TESTING/SAMPLING

1. Upon request by the AQD District Supervisor, the permittee shall verify NO<sub>x</sub> and CO emission factors used to calculate emissions from the engine. As of this inspection, no request has been made and none is recommended.

#### VI. MONITORING/RECORDKEEPING

- 1. The permittee shall monitor and record the natural gas usage for each engine. Records of natural gas usage are being kept.
- 2. The permittee shall complete all required calculations by the last day of the calendar month. Records provided by the facility indicate these are being performed in a timely manner.
- 3. The permittee shall maintain a log of all maintenance activities conducted. Records provided by the facility indicate this is being performed.
- 4. The permittee shall keep records of the hours that the engine is operated without the control device. Engine 2 is equipped with a catalyst. There are no records in the last 12 months of this engine operating without the control device attached.

- 5. The permittee shall keep monthly and 12-month rolling time period  $NO_x$  emission calculation records for the engine. These records are being kept and demonstrate compliance.
- The permittee shall keep monthly and 12-month rolling time period CO emission calculation 6. records for the engine. These records are being kept and demonstrate compliance.

**VII. REPORTING -NA** 

**VIII. STACK/VENT RESTRICTIONS** 

1. Stack parameters for each engine appear correct and do not appear to have been recently modified.

# **IX. OTHER REQUIREMENTS -NA**

At the time of this inspection, this facility was in compliance with their air permitting.

NAME DATE 5/18/17 SUPERVISOR