

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

N807050651

FACILITY: BREITBURN OPERATING LP - NEW CALEDONIA CPF		SRN / ID: N8070
LOCATION: NW NE SEC 20 T8N R6E, CALEDONIA TWP		DISTRICT: Gaylord
CITY: CALEDONIA TWP		COUNTY: ALCONA
CONTACT:		ACTIVITY DATE: 05/31/2019
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

On May 31, 2019 traveled to N8070 Breitburn New Caledonia CPF located in Caledonia Township, Alcona County for an unannounced scheduled inspection to determine compliance with PTI 188-08. This is an opt-out source.

### 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 on side next to a Trendwell facility (N7901).

### EQUIPMENT ON SITE

The facility consists of 1 engines - a permitted Caterpillar 399 TA 830 hp engine with catalyst.

Onsite there is a lined tank farm with 2 tanks under 400 bbl, and several small storage tanks – used oil, engine oil are inside the building.

Per the permit the facility is located on Trendwell property and leased to Breitburn. Next to the Breitburn CPF is Trendwell's Wolf Creek CPF - N7901. 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.

### REGULATORY DISCUSSION

PTI 188-08 is for 1 engine and a dehy.

The engine is 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 399 engine was operating. No visible emissions or odors were noted.

The Caterpillar 399 TA was operating at 1163 RPM and had engine oil pressure of 60 PSI. The catalyst inlet temperature was 1054 degrees Fahrenheit (F), and outlet temperature was 1103 degrees F.

The stack for EUENGINE1 is required to have a minimum height of 30 feet – based on visual observation, the stack appears to meet this condition.

#### **RECORDS SPECIAL CONDITIONS:**

##### **SC 2.6, 2.10, 2.11 and 2.12 - Emission Limits and throughputs:**

Parameter:	EUENGINE1	
	Limit	Reported
NOx (tpy, 12 month rolling)	22	12.1
CO(tpy, 12 month rolling)	20	9.5
Fuel (per month)	NA	3.62

##### **SC 2.3, 2.4, 2.8, 2.9 - Maintenance and PM-MAP:**

The facility has an approved MAP from 2008. The engine is correctly listed in Appendix A of MAP. Records received were reviewed and meet conditions of MAP.

Records show EUENGINE1 operated zero hours without the catalyst. The permit allows for 200 hours.

Records show the temperature rises across the catalyst, which implies proper operation. The inlet temperature is greater than 750 degrees and the outlet temperature is less than 1350 degrees, which are the parameters indicated in the MAP for proper operation.

##### **SC 2.13a - Stacks:**

The stack for Engine 1 is required to have a minimum height of 30 feet and maximum diameter of 16 inches. Based on visual observation during the site inspection, the stack appears to meet these conditions.

##### **SC 3.1 and 3.2 - Sour gas verification:**

Gas analysis was provided - hydrogen sulfide is 'ND' (non-detect).

#### **MAERS**

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

#### **COMPLIANCE DETERMINATION**

Based on the scheduled inspection and records review, the facility appears to be in compliance with PTI 188-08.

NAME Becky Radulski

DATE 9-27-19

SUPERVISOR SAJ