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

P001449276

FACILITY: RIVERSIDE - ELVIRA 11 PHASE 2		**SRN / ID:** P0014
LOCATION: Elmira Township, Section 17, ELMIRA TWP		**DISTRICT:** Gaylord
CITY: ELMIRA TWP		**COUNTY:** OTSEGO
CONTACT: Natalie Schrader ,		**ACTIVITY DATE:** 06/19/2019
STAFF: Bill Rogers	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On June 19, 2019, Jodi Lindgren and I inspected the Elvira 11 Phase 2 CPF. The facility is located in Section 17 (not 11) of Elmira (not Elvira) Township. It may be reached by a driveway heading north from Parmater Road west of Camp 10 Road.

This facility's permit was voided in February, 2019. I had thought all equipment had been removed from the site, but wanted to check to be sure. All the equipment is, in fact, still on site. It has been shut down and I assume Riverside intends to keep it shut down permanently, but until the equipment is removed we should keep track of the site.

Until the permit was voided, this facility had PI 279-09. This would have been in force until February of this year.

Permit 279-09, Table EUDEHY, requires compliance with National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH. The United States Environmental Protection Agency has not delegated enforcement of this Subpart to the Air Quality Division. However, as set forth in Subpart HH and in Condition VI.1 of table EUDEHY, one way of complying is by showing exemption from the Subpart's requirements, and one grounds for exemption is by showing natural gas flow through the dehydrator is less than 85,000 cubic meters of gas (about 3 million standard cubic feet) per day. Gas production figures for the facility show that it was producing about 170,000 cubic feet of gas per day, well under the 3 million cubic foot threshold for Subpart HH.

Table EUENGINE, Condition I.1, sets a NOx limit of 10 tons per 12 month rolling time period. Emissions calculations, attached, show maximum emissions of under 2 tons per 12 month rolling time period. This complies with the permit condition.

Condition I.2 sets a CO limit of 20 tons per 12 month rolling time period. Emissions calculations, attached, show maximum emissions of at most 5.1 tons per 12 month rolling time period. This complies with the permit condition.

Condition III.1 requires a Malfunction Abatement Plan. The AQD received a MAP for this site and approved it on July 8, 2010. This complies with the permit condition.

Condition III.2 allows operating the engine up to 200 hours per year without the catalytic oxidizer. I did not find any data in the attached data sheets addressing this restriction, so I do not know whether the facility was in compliance with it. If the facility restarts (which would require re-permitting it at this point) I will ask for further information on this condition, but I judge it is not necessary now.

The engine is equipped with a catalytic oxidizer. Condition IV.1 requires any add on control device to be installed and operating properly. During my inspection it appeared the catalytic oxidizer was still present. Notes on facility records claim that in April of 2018 it was tested, showing an 83.9% NOx reduction and an 86.1% CO condition. This indicates it was operating properly at that time. Inlet and outlet temperature data, attached, shows a temperature rise across the catalytic oxidizer, indicating it was burning air contaminants as the engine operated. This also suggests the catalytic oxidizer was operating properly up to the time the facility shut down.

Condition VI.2 requires monitoring and recording natural gas usage in the engine. Data showing fuel consumption is attached.

Condition VI.3 requires a maintenance log. Sample maintenance records are attached.

Condition VI.4 requires recording hours of operation without the catalytic oxidizer. In previous inspections of this facility this information was included, but I don't think we got it this time. If the facility restarts (which would require re-permitting at this point) I will ask for further information to determine compliance with this condition.

Condition VI.5 requires keeping engine fuel use records. These are included on the attached data sheets.

Condition VI.6 and VI.7 require keeping monthly and 12 month NOx and CO emissions calculations. This information is included on the attached data sheets.

Condition VIII.1 sets stack dimensions as a maximum diameter of 12 inches and a minimum height of 24 feet above ground level. The stack appeared to meet this condition.

COMMENTS:

No equipment seemed to be operating on site. The engine was not operating, and had a bucket upside down over the top of the exhaust stack. The glycol dehydrator was silent and the burner stack was cold.

Equipment on site seemed unchanged from previous inspections. The dehydrator still had a Wenco flame arrested burner of 125,000 BTU/hour capacity. The dehy burner stack looked about 6 inches diameter and 20 feet high, unobstructed vertically upward. The still vent was about 2 inches diameter and 12 feet above ground level, terminating in a T shaped pipe fitting as a cap.

There were two 300 gallon drum on stilt tanks near the dehy. They stood over wooden berm structures. Waterproof fabric had been fastened over the tanks and to the edges of the berm structures to form something like a tent, probably to keep rainwater from filling the berms. One of these tanks was labeled methyl alcohol and the other triethylene glycol.

The compressor shed contains one Caterpillar natural gas-fired compressor engine. It was not operating. It had a paper taped over the instrument panel which said "Preserved 9-25-18. No coolant. Mag unhooked. Batteries unhooked Engine breather blocked off. Frame and engine tagged. Frame breather plugged." I could not determine whether any of these notes were correct.

There were two 300 gallon drum on stilts tanks inside the compressor shed, one labeled as ISO 100 industrial oil and the other as engine oil. There was a cubical plastic container about 4 feet on a side, near the engine, which was probably engine coolant; it had a small amount of some liquid in it, perhaps 20% full.

The exhaust leaves the building horizontally to a horizontal muffler. After the muffler an elbow directs exhaust through a tall vertical stack. The exhaust is unobstructed vertically upward.

I did not see any stained soils that might indicate spills. Jodi pointed out the containment structure under the glycol dehydrator was full of water, so any spill there would not be contained. I will notify the company of this.

NAME William J Rogers L. DATE 5/28/19 SUPERVISOR