DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P018466088

FACILITY: Lambda Energy Resources, LLC - Winston Churchill		**SRN / ID:** P0184
LOCATION: W. Baily Rd NE 1/4 of the SE 1/4 Sec 21 and, COMINS		**DISTRICT:** Gaylord
CITY: COMINS		**COUNTY:** OSCODA
CONTACT:		**ACTIVITY DATE:** 01/13/2023
STAFF: David Bowman	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Site inspection no violations found		
RESOLVED COMPLAINTS:		

On 13 Jan 2023 I, David Bowman MI EGLE AQD, inspected P0184 Optout Source Lambda Winston Churchill CPF, located at West Bailey Rd, Comins, MI, operating under the conditions of permit to install (PTI) 229-10. Source is located by traveling North of Comins on M33 to Boiling Springs Rd, travel West of Boiling Springs Road approximately one mile. There is a gate and the drive back to the source is close to half mile plus – ensure prior coordination for access. When I arrived, the gate was open and I met the Lambda employee (we were both in our trucks so I did not get his name) as he was leaving and agreed to lock gate when I was finished so he would not have to come back.

It was 18ºF, snowing, with light winds East to West at 3-5 mph. There was no discernable odors, no obvious spills, and very little noise at the site. The site is well maintained and there were no violations noted during my inspection.

EUDEHY

requires compliance with the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH. The United States EPA has not delegated enforcement of this Subpart to AQD. However, based on previous experience it is extremely likely the dehydrator at this facility would be exempt from the more stringent pollution control provisions of Subpart HH. This Subpart exempts dehydrators which emit less than approximately 1 ton per year of benzene. This facility processes Antrim Formation gas, which is low on hazardous air pollutants, including benzene.

The stack for the heater on EUDEHY was approximately 20' tall and no greater than 6" and had a rain cap.

Tank for triethylene glycol is approximately 300 gallons and located outside of the compressor building on stilts in containment. Inside the building there was 55 gallons drums labeled good and bad triethylene glycol.

EUENGINE

The MAP and ZZZZ certification state 625 HP Cat 398TA CM4611206 is present, but I did not find a data plate to confirm or deny this. The skid is labeled GCS 1135 and this is consistent with the previous site inspection report CA_P018449125 dated 06/07/2019. There was an air fuel ration controller present and in auto operation mode. There is a device present for monitoring natural gas usage by the engine. The catalyst was present and data supported it was working correctly.

The daily check sheet data corresponded to the data on the control panel. This check sheet had a section that tracked downtime and corrections. The data in that section matched the data in the daily columns for down time and detailed the maintenance being conducted.

Stack:

I used the Nikkon Forestry Pro II to verify SVENGINE Height averaged to 49.9'and estimated the diameter of the stack to be no greater than 12" (EUENGINE SC VIII. 1). There was steam rising from the stack, but no other VE in the steam plume.

FGFACILITY

Letter on file with AQD certified EUENGINE for 40 CFR Part 63 Subpart ZZZZ dated Jan 31 2011.

NAME DJR DATE 2-13-23 SUPERVISOR Shane Nixon