

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

P055664858

<b>FACILITY:</b> NuEnergy Operating, Inc. (Zebulon 16 CPF)	<b>SRN / ID:</b> P0556
<b>LOCATION:</b> Clinton Twp., Section 16, COMINS	<b>DISTRICT:</b> Gaylord
<b>CITY:</b> COMINS	<b>COUNTY:</b> OSCODA
<b>CONTACT:</b> Jeff Smetzer , President	<b>ACTIVITY DATE:</b> 05/10/2022
<b>STAFF:</b> Becky Radulski	<b>COMPLIANCE STATUS:</b> Compliance
<b>SUBJECT:</b> FY22 scheduled inspection and records review	<b>SOURCE CLASS:</b> SM OPT OUT
<b>RESOLVED COMPLAINTS:</b>	

**AQD Staff traveled to P0556 Name: NuEnergy Operating, Inc. Zebulon 16 CPF located in Clinton Township, Oscoda County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 157-14. This is an opt out permit.**

### **LOCATION**

The facility is located in Oscoda County, Clinton Township. From M-33, approximately 1 ½ miles south of the Montmorency/Oscoda County line, turn east onto Delano Road, at the T-in-the-road turn right on Tote Road, eventually the pavement resumes, travel south about 1 mile, turn left/east on Saddleback Road travel about 1 mile, on the left is a lake, turn right on Saddleback Trail, take road to the end. There is a gate which was unlocked at the time of the inspection.

### **REGULATORY DISCUSSION**

PIT 175-14 was issued on October 31, 2014 and is an active permit. The permit is for an uncontrolled natural gas fired compressor engine. The engine's PTE uncontrolled NOx emissions is 67.45 tpy.

PTI 175-14 is an opt out permit because the permit allows engine replacement with an equivalent or lower emitting engine. The replacement engine can be with or without control.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to EGLE. The glycol dehydrator is listed as exempt in the application under Rule 282(b)(i) because the burner has a maximum heat input of less than 50,000,000 BTUs per hour.

### **INSPECTION NOTES**

The facility contains a compressor engine, oil-water separator and glycol dehydrator system. The engine was operating during the inspection. No visible emissions or odors were observed from the engine. A slight odor was observed from the glycol dehydrator.

The exhaust stack appeared to visually meet the height and diameter requirements of the permit.

Several small drums were located onsite containing hydraulic oil.

### **RECORDS REVIEW**

**EUENGINE, Special Conditions (SC)**

SC I. 1 and 2; VI. 1, 4 and 5; V. 1. NOx emissions are limited to 68 tpy, and CO emissions to 6 tpy. Records show actual emissions at 31.5 and 2.3 tpy respectively.

SC III. 1.; VI. 3. Requires the facility to submit and maintain a Malfunction Abatement Plant (MAP). The facility has an approved MAP dated January 8, 2015. The MAP includes a CAT G3406 TA 4-stroke rich burn engines with no control or AFRC. The permittee keeps the required MAP records.

SC IV. 1; VI. 2. There is a device to monitor and record the natural gas usage for EUENGINE on a continuous basis. 12 month rolling indicated 9.2 MMCF used.

SC VII. 1. Allows for engine switch out to an equal or lesser emitting engine, with notification to the AQD of the change. No notifications have been received.

SC VIII. Requires SVENGINE1 to have a minimum height of 32 feet and maximum diameter of 6 inches. Based on visual estimates during the inspection, the stack appears to meet this condition.

**MAERS**

The 2022 MAERS report was reviewed. No concerns were noted.

**MACES**

No updates needed.

**COMPLIANCE DETERMINATION**

Based on the scheduled inspection and records review, P0556 NuEnergy Zebulon CPF appears to be in compliance with PTI 157-14.

NAME Becky Radubski

DATE 12-2-22

SUPERVISOR Shane Nixon