

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

P098570097

<b>FACILITY:</b> RIVERSIDE - CHESTER 12 FOX SKLARCZYK C4-13 BOOSTER		<b>SRN / ID:</b> P0985
<b>LOCATION:</b> T30N-R2W Sec 13 NE NE SE, CHESTER TWP		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> CHESTER TWP		<b>COUNTY:</b> OTSEGO
<b>CONTACT:</b> Natalie Schrader , Compliance Coordinator		<b>ACTIVITY DATE:</b> 10/26/2023
<b>STAFF:</b> Sharon LeBlanc	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY 2024 FCE site inspection and records review. sgl		
<b>RESOLVED COMPLAINTS:</b>		

## **INTRODUCTION**

On October 26, 2023, AQD District Staff conducted a, scheduled site inspection of the Riverside Energy Michigan LLC (Riverside), Chester 12 Sklarczyk C4-13 Facility. (P0985) The referenced facility is a booster site located in the NE ¼, NE ¼, SE1/4 of Section 13, Township 30N, Range 2W, Livingston Township, Otsego County, Michigan.

The referenced facility is considered a synthetic minor opt-out and operates under Permit to Install (PTI) No. 199-18. The last compliance inspection of record was conducted on September 20, 2021. At that time no compliance issues were noted, and the facility was determined in compliance with their permit.

The facility is a fenced, gated and unmanned facility is located on the north side of the Skylarzck Seed Farm Property, adjacent to agricultural properties and large residential properties.

Records required to make a compliance determination for the facility were requested electronically on September 8, 2023. The data provided (September 11<sup>th</sup>, 2023) has been reviewed and incorporated into this document.

## **FACILITY**

The referenced site is located between Gaylord and Johannesburg, Michigan. To reach the site Staff traveled west on M-32 from Johannesburg for approximately 1.75-miles. Sklarczyk Seed Farm is on the northside of the road and the drive to reach the facility is on the far west side of the Farm. The drive travels along the western boundary of the property, then turns to the right following along the north of the property.

This facility is considered a minor source with respect to the Title V program and the prevention of significant deterioration (PSD) rules and regulations. It is also considered an area source of HAP emissions. It is considered an opt-out permit due to inclusion of Special Condition VII.1 which allows for change out of an engine at the Facility.

A review of readily available aerials indicate that the Facility had not been constructed as of December 1985, but is present in May 1992 aerials.

Signs posted at a well onsite site reference Chester/Fox Sklarczyk C4-13, Permit #43697.Operator Log sheets on site refer to “Chester Fox @Sklarczyk Booster”

At the time of the October 26, 2023, site inspection, weather conditions included overcast skies, with temps of approximately 55 degrees Fahrenheit. Intermittent light rain, with little to no wind was noted. No emissions were noted from the stack onsite. No odors were detectable.

**EQUIPMENT**

A review of MAERS submittals indicated the presence of the following equipment onsite:

<b>Emission Units</b>	<b>MAERS installation date</b>	<b>Description</b>	<b>Other</b>
EUENGINE1	7/8/2019	CAT 3406 NA Unit 201817	SN 4FD001023 Manufacture date 8/3/1995  Engine relocated from Jordan 35 Facility (N6055).

Operating parameters at the time of the October 26, 2023, site inspection are presented below:

<b>Engine</b>	Unit 201817 – CAT 3406
<b>RPM</b>	1104
<b>Compressor Oil Pressure</b>	35 PSI
<b>Engine Oil Pressure</b>	60 PSI

**PERMITTING**

Permits of record for the Facility include the following:

<b>Permit No.</b>	<b>Approval Date</b>	<b>Void Date</b>	<b>Company Issued to</b>
199-18	April 24, 2019	NA	

			<b>Riverside Energy Michigan LLC</b>
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## **REGULATORY**

**The Chester 12 Sklarczyk C4-13 Booster does not process or store petroleum liquids onsite and therefore is not subject to one or more of the following 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subparts;**

- K, Ka or Kb (Storage vessels for Petroleum Liquids);
- KKK (Equipment Leaks of VOC from onshore NG Processing Plants);
- VV (Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry);

**No ASTs are associated with the site so it would also be exempt from 40 CFR Part 60 Subpart K, Ka or Kb are date-based standards of Performance for Storage Vessels for Petroleum Liquids for which construction, reconstruction or modification commenced:**

- After June 11, 1973, and Prior to May 19, 1978 (Subpart K)
- After May 18, 1978, and Prior to July 23, 1984 (Subpart Ka)
- After July 23, 1984, (Subpart Kb)

**40 CFR Part 60 Subpart OOOO (Standards of Performance for Crude Oil and NG Production, Transmission and Distribution) and Subpart OOOOa would apply to onshore affected facilities that are constructed, modified, or reconstructed after August 23, 2011, and September 18, 2015, respectively. Based on available information it appears that based on aerials, the facility has been in existence prior to its 2018 construction may not be applicable at this time but that future changes may be subject to the referenced subpart. No compliance determination has been made with reference to the subparts.**

**40 CFR Part 60 (NSPS) Subpart JJJJ for Spark Ignition (SI) Reciprocating Internal Combustion Engines (RICE) with manufacture dates before July 1, 2007. The manufacture date for the unit is reported to be 1995, and therefore exempt from the referenced subpart.**

**40 CFR Part 60 (NSPS) Subpart LLL - Standards of Performance for SO<sub>2</sub> Emissions from Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011. With respect to Subpart LLL, This Federal standard is applicable to Facilities operating sweetening units. No sweetening unit is associated with this site, therefore the referenced subpart is not applicable.**

**In addition to the NSPS Standards referenced above, the following 40 CFR Part 63 (Maximum Achievable Control Technology Standards A.K.A. MACT) Subparts may apply:**

- Subpart HH (HAPS from Oil and NG Production Facilities)
- Subpart ZZZZ (Reciprocating Internal Combustion Engine aka RICE)
- Subpart JJJJJJ (Industrial, Commercial and Institutional Boilers and Process Heaters)

With respect to Subpart HH, the applicable emission unit is the dehydration system. As no dehy system is associate with the Facility, the referenced subpart would not apply.

With respect to Subpart ZZZZ (RICE MACT), the facility engine was reported by the facility to be subject to the referenced subpart. At the time of report preparation, AQD has been delegated authority to implement and enforce the subpart. However, at this time compliance determinations for Federal requirements under Subpart ZZZZ for Area Sources have not been made. Based on a review of the PM/MAP for the facility it appears that requirements under the subpart have been incorporated into the PM/MAP. Compliance with the PM/MAP may indicate compliance with the referenced subpart.

Maintenance records supplied by the Facility for the referenced engines indicated that the RICE engines are on a monthly and quarterly maintenance schedule. No engine change records were found in District Files.

NESHAP subparts JJJJJJ pertain to Industrial, Commercial and Institutional Boilers and Process Heaters for Area source of HAPS, respectively. As no boiler or process heater exists onsite, it appears that the referenced subpart would not apply.

### **Preventative Maintenance/Malfunction Abatement Plan (PM/MAP)**

PM/MAP are required under the existing permit for EUENGINE1 located onsite. PM/MAP submittals of record in District Files include the following:

<b>Submittal Date/Date Recv'd</b>	<b>Approval Date</b>	<b>Operator</b>
July 12, 2019	UNK	Riverside

### **Reports Received**

Reporting requirements for the Facility are limited to annual emissions reports which are discussed below. No CEDRI submittals are of record for this Facility.

### **COMPLIANCE**

Since the September 20, 2021, site inspection there have been no complaints, violation notices or consent orders identified for the Facility.

Annual emissions are reported for the Facility as part of the MAERS reporting system. Annual submittals have historically been received in a timely manner, the emission estimates for the 2022 calendar year were submitted February 2, 2023.

Compliance status for the facility had been based on information obtained during the October 26, 2023, site inspection, as well as on supplemental data and reports submitted.

## PTI 199-18 Permit Conditions

Emission units covered by the above referenced PTI are limited to EUENGINE1. Records under the referenced permit are required to be maintained for a period of 5 years. Permit conditions for the referenced EU are summarized below.

**EUENGINE1** – The referenced engine is a NG-fired (SC II.1), 215 HP (SC IV.1), CAT 3406 NA RICE. The engine is used for gas compression.

The Facility reported that the unit was transferred from the Jordan 35 Facility (N6055), and at that time was equipped with a catalytic control. They further indicated that the permitted engine does not require a pollution control device. From records reviewed it appears that the catalyst has been rendered inoperable/removed from the site in March-April 2022.

Emission limits associated with EUENGINE1 consist of 12-month rolling total NOx limit of 55 TPY. Emission calculations for NOx are required under SC VI. Emissions associated with EUENGINE1 consists of :

<b>12-Month Rolling Time Period Ending</b>	<b>NOX Emissions (TPY)</b>
<b>December 31, 2023</b>	<b>20.49</b>
<b>July 30, 2023</b>	<b>19.70</b>
<b>Limits</b>	<b>55 (SC I.1)</b>

In addition to the above emission limits, the permit requires the preparation and submittal of a PM/MAP (SC III.1) within 60-days of permit issuance. The initial document was submitted in compliance with the permit conditions. The most recent revision of the document is dated July

No engine changeouts are of record for 2022 or 2023 to date.

- Verification of NOx and CO emission rates from EUENGINE by testing at owners expense per the request of the District Supervisor (SC V.1)

District files do not contain any requests for verification testing, nor verification testing results. Therefore, it would appear the above referenced condition is not applicable at this time.

**Monitoring and Recordkeeping** - The permittee is required under PTI 199-18 to maintain the following records:

- The permittee shall monitor and NG usage from EUENGINE1 on a continuous basis. (SC IV.2, VI.2)
- Maintain records of monthly fuel use for EUENGINE1 required by SC VI.2. (SC VI.4)

Records provided by the Facility, were noted to be complete and in compliance with permit conditions. Fuel Usage for 2022 and 2023 to date are summarized below:

<b>Engine – 12-month rolling time period ending</b>	<b>Monthly Fuel Usage (MMcf/month)</b>	<b>12-month rolling total Fuel Usage (MMcf)</b>
Dec. 2022	0.489 – 0.608	6.755
July 2023	0.488 – 0.608	6.494
<b>LIMIT</b>	<b>NA</b>	<b>NA</b>

- Maintain a log of all significant maintenance activities conducted and all repairs made to EUENGINE1 and any associated control device pursuant to SC III.1. (SC VI.3)
- Notification of the AQD District Supervisor of any change/replacement of EUENGINE with an equivalent-emitting or lower-emitting engine and submit acceptable emissions data as verification (SC VII.1)

Maintenance records for the EUs indicate that the Facility conducts monthly scheduled service activities. In addition, approximately every 3 months service activities including changing oil and oil filters, adjusting valves, checking compression, belts, greasing bearings, checked timing, etal.

Stack and Vent Restrictions under PTI 199-18 include a maximum diameter of 4-inches and a minimum height of 21 feet above land surface for SVENGINE. Records provided by the facility report SVENGINE as a 4-inch diameter, 23-foot stacks. (SC VIII.1)

**SUMMARY**

On October 26, 2023, AQD District Staff conducted a, scheduled site inspection of the Riverside Energy Michigan LLC (Riverside), Chester 12 Sklarczyk C4-13 Facility. (P0985) The referenced facility is a booster site with a single engine located in the NE 1/4, NE 1/4, SE1/4 of Section 13, Township 30N, Range 2W, Livingston Township, Otsego County, Michigan.

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Based on observations made, and records provided it appears that the Facility is in general compliance with their PTI conditions. sgl

NAME Maureen J LeBlanc

DATE 1-29-24

SUPERVISOR Shane Nixon