

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Other

N583124791

FACILITY: Breitburn Energy Company - Wilderness/Hayes 29		SRN / ID: N5831
LOCATION: 10875 Geronimo Trail, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Carolann Knapp , EH&S Regional Rep (Breitburn)		ACTIVITY DATE: 04/04/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Breitburn's Technical Review for ROP Renewal		
RESOLVED COMPLAINTS:		

**N5831 – Wilderness/Hayes 29 Facility – Section 1**

## Part A General Information

1. a. The NAICS is correct
- b. Address is correct
2. Corrected the owner name from **Breitburn Energy Company – Wilderness/Hayes 29** to: **Section 1 – Breitburn Operating LP – Wilderness CO2 Central Production Facility**  
**Section 2 – Linn Energy – Hayes 29 Compressor Station** (The ROP is now sectioned out)
3. Confidential Information:  
   None
4. Contact and Responsible Information  
   Contact Information - 2 listed. Responsible Official - 1 listed.
5. Additional Information  
   - NoAI-001 forms.

## Part B Application Submittal Information

1. Compliance Statement
  - a. All boxes checked yes
  - b. Appears to have no missing information

## Part C Source Requirement Information

1. MEARS: Facility reports emissions from all units
2. Federal ozone-depleting substances program: Facility is not subject.
3. Federal Prevention of Accidental Release Program: Appears Facility is not subject.
4. Greenhouse Gas Emissions: Appears Facility is not subject.
5. CAIR/Acid Rain: Appears Facility is not subject.
6. Required Plans: Yes
  - a. Malfunction Abatement Plan (AI-MAP)
7. Additional Information: Yes
  - a. AI-001 is the enclosed Malfunction Abatement Plan, Reviewed additional information

## Part D Exempt emission unit information

1. a. Two exempt emission units: EUHEATERS (exemption 282(b)(i)) and EUTANKS (exemption 284(e)).
- b. The 201 Rules are of the Rules listed under 212(4).
- c. NA
2. a. EUTANKS & EUHEATERS are exempt pursuant to Rule 212(4) and not Rules 212(2) or Rule 212(3).
- b. EUTANKS & EUHEATERS will be identified in the Staff Report.
- c. NA
3. NA

## Part G: Exempt Emission Units under 281(h), 285(r), 287(c), or 290

- No R281(h), R 285(r)(iv), R287(c), or R290 exempt emission units.

## Part E Existing ROP Information

1. E1. The source purposes changes made to delete that EUENGINE1 is equipped with an oxidation Catalyst and add an oxidation catalyst for EUENGINE4. This was reported incorrectly in the previous ROP. Refer to Part H below.

2. E2. The stacks for EUENGINES 1, 2,3, and 4 were not reported in the most recent MAERS reporting year of 2012. The stacks for these EUENGINES are included on the current applicable MAERS form for reporting year 2013.
3. E3. A CAM plan was submitted and already incorporated into the ROP (under FGWAUKENGINES) for Engines 5, 6, and H29. It should be noted that in the ROP application for this facility they mentioned there was a CAM plan for EUENGINE3, EUENGINE4, and EUENGINEH29, which is incorrect, it should be for EUENGINE5, EUENGINE6, and EUENGINEH29. Since EUENGINEH29 is now operated by Linn Operating, Inc. the CAM Plan addresses only EUENGINE5 and EUENGINE6.
  - a. Reviewed CAM incorporated in ROP, and appears complete.
4. The emission units identified in the existing ROP do not produce fugitive dust emissions.
5. No emission units have been modified or reconstructed.
6. No emission units have been dismantled.

#### Part F Permit to Install (PTI) Information

1. F1. No new PTIs have been added since the previous ROP.
2. F2-F6. NA
3. F7. The PTI listed in the Attachment in Part F was already added to the existing ROP thru a minor modification, and is entered in Appendix 6 of the working draft ROP.

#### Part H Requirements for Addition of Change

- H1. Changes were added to the ROP that were not identified in Parts F or G above.
- H2 & H3. The oxidation catalyst was removed from the EUENGINE1 description (there are no controls on Enigne1), and an oxidation catalyst was added to EUENGINE4 emission unit description. And the EUGLYCOLDEHYDRATOR was changed to EUGLYCOLDEHYDRATOR.
- H4. A flexible group was added to include the applicable requirements for emission units subject to 40 CFR Part 63 Subpart ZZZZ for the RICE MACT
- H5. The facility is not subject to consent orders or judgments
- H6-H8. The source did not add, change, or delete the Source-wide Conditions, emission limit requirements, or Material Limit Requirements
- H9-H15. The source added a flexible group to include the applicable requirements for emission units subject to 40 CFR Part 63 Subpart ZZZZ.

#### Compliance Plans

The facility is in compliance and has indicated they will be in compliance when the ROP is issued.

#### Review of Working Draft (from Company's Mark-Up)

1. No changes were made to the Source-Wide Conditions Table.
2. The Emission Unit Summary Table just contained clarification corrections to EUENGINE1 and EUENGINE4. No changes were made to the Flexible Group Summary Table except for formatting corrections.
3. The emission units and flexible groups either didn't contain a description in the associated tables or contained a vague description. The emission units and flexible groups' descriptions were updated in the Working Draft ROP.
4. No Emission Limits or Material Limits were applicable for EUGLYCOLDEHYDRATOR and FGWAUKENGINES. No Material Limits ere applicable for FGCATENGINES, and the Emission limits show conditions V.1 and VI.6 which accurately demonstrates compliance with the limits.
5. -6. The control equipment is addressed through the MAP and each emission limit has an enforceable requirement used to demonstrate compliance. While the ROP was open for this stationary source, the RICE MACT compliance date became active. Breitburn submitted FGRURALSIRICEMACT, which was not reviewed by DEQ
7. The wording of all conditions appear to be enforceable.
8. Plans are ready to be included for Public Comment.
9. - 11. UARs and Appendices were reviewed for each emission unit and flexible group.

#### AQD Changes throughout ROP review:

1. Added HAP limits to the Source-Wide Conditions Table using UAR R336.1213(2)(d), and added Condition VI.3 to monitor HAP emissions. Since Linn uses an oxidation catalyst to stay below HAP limits, so they stay an area source.

2. The Source-Wide Conditions Table mentioned "Equipment" as FGFACILITY. The ROP doesn't contain a table for FGFACILITY. So I left the table blank under "Equipment" and added "Stationary Source" in each condition that mentioned FGFACILITY, in Sections 1 and 2 of the ROP.

3. Under FGCATENGINES, I removed EUENGINE5 and EUENGINE6 because they are addressed under FGWAUKENGINES. Since EUENGINES 2, 3, and 4 have oxidation catalysts, I incorporated Process/Operational Restrictions, and Monitoring/Recordkeeping requirements for temperature and differential pressure readings into these conditions.

4. For FGWAUKENGINES, I added emission limits table for EUNGINES 5 and 6, since they were removed from FGCATENGINES. I added the applicable Process/operational, Testing/Sampling, and Monitoring/Recordkeeping requirements to each condition.

5. In FGWAUKENGINES, I took out the CAM requirements for "Monitoring" because the facility does not have monitors installed. I also took out the CAM Quality Improvement Plan (QIP) because it was optional.

6. I changed the field groups from FGENGINES and FGCAM to FGCATENGINES and FGWAUKENGINES, since I separated out the EUENGINES 1-4 (which are all caterpillar lean burn engines) from EUENGINES 5 & 6 (which are Waukesha Rich burn engines with CAM requirements). The Waukesha engines formerly listed under FGCAM now have additional requirements in the Field Group other than just CAM requirements.

NAME *Clayton Owens*

DATE *4/4/14*

SUPERVISOR *[Signature]*