

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

N609965751

<b>FACILITY:</b> VCP Michigan - Livingston 34		<b>SRN / ID:</b> N6099
<b>LOCATION:</b> 685 E. M-32, LIVNGSTON TWP		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> LIVNGSTON TWP		<b>COUNTY:</b> OTSEGO
<b>CONTACT:</b> Sandy Mankowski ,		<b>ACTIVITY DATE:</b> 11/10/2022
<b>STAFF:</b> Rob Dickman	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled inspection of this opt out source.		
<b>RESOLVED COMPLAINTS:</b>		

The VCP Livingston 34 is a natural gas central processing facility (CPF) located in Livingston Township, Otsego County. Operations at the facility are managed by VCP Oil Company located in Gaylord, Michigan. At this facility, sweet natural gas from low-pressure Antrim formation wells flow to the facility via buried flowlines. Upon reaching the facility, the gas is compressed and directed through a triethylene glycol dehydrator for moisture removal. Following dehydration, natural gas is directed to a sales pipeline.

I performed an inspection on this source with respect to Permit to Install (PTI) 225-04B. The inspection consists of an onsite inspection of equipment and a review of records required by the PTI. The onsite inspection was performed on November 10, 2022. Required records for the facility were requested on October 31, 2022 and received on November 28, 2022. The period of time requested for these records was September 2021 through August of 2022. Following are findings of this inspection:

Upon arrival on site, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation. An inventory of pertinent equipment at the facility was as follows:

- Caterpillar model G398HCTA engine with catalytic emission control
  - Unit Number – 158\*
  - RPM – 999
  - Oil Pressure – 55 psi
  - Water temperature – 200 F
- \*This engine appears to be the same as in previous inspections.
- One 400-barrel (bbl) capacity Aboveground Storage Tank (AST) exempt under R 336.1284(2)(e)
- One 100-barrel (bbl) capacity AST exempt under R 336.1284(2)(e)
- Glycol dehydrator, permitted, but could be exempt under R 336.1288(2)(b)(ii)

The dehy is required to comply with the provisions of National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH as applicable. This dehy is exempt from the conditions of this Subpart as records provided by the facility indicate the facility processes approximately 8206 scm of natural gas per day. Well below the exemption threshold of 85,000 scm/day.

Nitrogen Oxides (NOx) emissions from this facility are not to exceed 67.9 tons per year. Carbon Monoxide (CO) emissions are not to exceed 77.4 tons per year. Both limits are based on a 12-month rolling time period as determined at the end of each calendar month. Compliance with these emissions limits is demonstrated through recordkeeping and emissions calculations. Records provided from the company for the requested reporting period indicated the following:

- CO emissions for the facility as of August 2022 were 3.62 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- NOx emissions for the facility as of August 2022 were 2.29 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- No monthly value exceeded the emission limits in the preceding 12 months.

A Malfunction Abatement Plan is required for this engine. This plan was submitted and approved in March of 2008. A review of records indicates no time when the emission control device was bypassed.

Emission testing to verify NOx and CO emissions is to be conducted up request from the AQD. This testing has not been requested and is not recommended at this time.

A device to measure natural gas usage by the engine is required. This engine is so equipped, and records of usage were submitted by the facility.

Records of maintenance activities at this facility are being kept. These records were included in the records submission and are included with this report.

The stack for the engine is to be at least 39 feet tall and have a maximum diameter of 10 inches. Upon inspection, this stack appears to meet this criterion and does not appear to have been recently modified.

Wells feeding this facility are removing gas from the Antrim formation. Natural gas extracted from this formation is considered "sweet" by definition.

At the time of the inspection, this facility was in compliance with the facility opt out permit. No further action is recommended.

NAME  DATE \_\_\_\_\_ SUPERVISOR \_\_\_\_\_