

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : BREITBURN OPERATING LP - ELMER FUDD 1	SRN : N6104
Location : SW/4, NE/4, NE/4, T28N, R2E SEC 5	District : Gaylord
	County : OSCODA
City : ELMER TWP State: MI Zip Code : 48647	Compliance Status : Compliance
Source Class : SM OPT OUT	Staff : Becky Radulski
FCE Begin Date : 12/20/16	FCE Completion Date : 12/20/2017
Comments : FY18 scheduled inspection and records review	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/20/2017	Scheduled Inspection	Compliance	FY18 scheduled inspection
12/18/2017	Other	Compliance	FY18 records review
02/01/2017	MAERS	Compliance	2016 MAERS, See MAERS for any additional comments

Name: Becky Radulski **Date:** 1/2/18 **Supervisor:** SN



DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N610442899

FACILITY: BREITBURN OPERATING LP - ELMER FUDD 1		SRN / ID: N6104
LOCATION: SW/4, NE/4, NE/4, T28N, R2E SEC 5, ELMER TWP		DISTRICT: Gaylord
CITY: ELMER TWP		COUNTY: OSCODA
CONTACT: Carrolann Knapp, Environmental Specialist		ACTIVITY DATE: 12/20/2017
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY18 scheduled inspection		
RESOLVED COMPLAINTS:		

On December 20, 2017, AQD Staff traveled to N6104 Breitburn Operating – Elmer Fudd 1 CPF located in Elmer Township, Oscoda County, for a scheduled inspection to determine compliance with PTI 662-96A. This is an opt out permit. During the inspection, the operator, Dave, was briefly onsite.

The Elmer Fudd 1 CPF is a natural gas production facility. It processes natural gas from Antrim wells to dehydrate and compress the gas prior to the pipeline transport.

LOCATION

The facility is located southeast of Lewiston. Travel east of Lewiston on County Rd 612 4 miles to Granholm Rd. Travel south on Granholm Rd approximately 2 miles. Granholm Rd curves to the west, then abruptly turns to the east; however Eastwood Rd continues south. Follow Eastwood Rd. The access to the facility is immediately south of the Eastwood/Granholm intersection on the east side of the road.

REGULATORY DISCUSSION

PTI 662-96A was issued November 3, 2006, voiding the prior permit PTI 662-96. The permit was updated in 2006 to reflect changing out EUENGINE1 from a Caterpillar 399TA rich burn 830 hp engine to a Caterpillar 3516 TALE lean burn 1340 hp engine. EUENGINE2 remained the same, a Caterpillar 3516 TALE lean burn 1340 hp engine.

AQD received a notice to switch out a a Caterpillar 3516 TALE engine with a like engine on June 2, 2014. This notice was reviewed and approved by AQD. The engine switch out with an equivalent emitting engine is allowed per permit PTI 662-96A, special condition 1.8.

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

INSPECTION NOTES

Onsite are two Caterpillar 3516 learn burn engines. Both engines were operating during the inspection, with no visible emissions or odors noted from their respective exhaust stacks. Each unit has a muffler. EUENGINE2 has an AFRC which was replaced 5/21/07, as required by the MAP.

During the inspection, the engines were operating as follows:

	EUENGINE1	EUENGINE2
RPM	1062	1080
Engine Oil Pressure, psi	60	60

The engines share a common glycol dehydrator, which was operating during the inspection. No odors were noted from the glycol dehydrator. Also onsite is a bermed tank area which was lined with a black lining, visible in areas through the snow. Two brine tanks were present in the tank area, each approximately 400 barrels.

The exhaust stacks from the engines appeared to meet height and diameter conditions based on visual estimation.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, N6104 Breitburn Elmer Fudd 1 CPF appears to be in compliance with PTI 662-96A. Records were reviewed separately.

NAME Becky Radulski DATE 1/2/18 SUPERVISOR SN

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other

N610442732

FACILITY: BREITBURN OPERATING LP - ELMER FUDD 1		SRN / ID: N6104
LOCATION: SW/4, NE/4, NE/4, T28N, R2E SEC 5, ELMER TWP		DISTRICT: Gaylord
CITY: ELMER TWP		COUNTY: OSCODA
CONTACT: Carrolann Knapp , Environmental Specialist		ACTIVITY DATE: 12/18/2017
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY18 records review		
RESOLVED COMPLAINTS:		

RECORDS REVIEW

The special conditions (SC) of the ROP are as follows:

FGENGINES – EUENGINE1, EUENGINE2 (both Caterpillar 3516 engines)

SC 1.1a Limits FGENGINES to 89 tpy of NOx, based on 12 month rolling. Records provided indicate the current 12 month rolling is 56.2 tpy, which is below the permitted limit.

SC 1.1b. Limits FGENGINES to 65 tpy of CO, based on 12 month rolling. Records provided indicate the current 12 month rolling is 26.6 tpy, which is below the permitted limit.

SC 1.2. Requires the permittee to have an approved Malfunction Abatement Plan (MAP). The AQD approved the MAP on July 29, 2013.

SC 1.3. Limits the number of hours an engine can operate without add on control. Both engines are lean burn, and do not have a catalytic converter, therefore this condition does not apply.

SC 1.4. Requires proper operation and maintenance of add on control. Both engines are lean burn, and do not have a catalytic converter, therefore this condition does not apply.

SC 1.5. Requires testing to confirm NOx emission factors if requested by AQD. The AQD has not requested testing to verify NOx emission factors.

SC 1.6. Requires natural gas usage to be monitored. Natural gas is monitored per engine. Usage is discussed in SC 1.10.

SC 1.7. Requires records of calculations to be kept and made available to the AQD. The facility complies with this requirement.

SC 1.8. Requires the permitted to maintain a log of all maintenance activities and make it available to the AQD. Daily maintenance records were reviewed onsite. Compressor maintenance logs were requested and provided. Records show on-going engine maintenance.

1.9. Requires tracking the number of hours an engine can operate without add on control. Both engines are lean burn, and do not have a catalytic converter, therefore this condition does not apply.

1.10. Requires records of monthly fuel use for each engine. The permit does not limit fuel use. Records were provided. In September 2017, EUENGINE1 had a natural gas throughput of 3,478 Mscf/month, which EUENGINE2 had a natural gas throughput of 3,445 Mscf/month.

1.11. Requires monthly and 12-month rolling calculations be kept for NOx and CO emissions. Calculations of monthly and 12-month rolling NOx and CO emissions are kept and available to the AQD. These records were discussed in SC 1.1a and 1.1b above.

1.12. Restricts SVENGINE1 stack parameters to a maximum diameter of 16 inches and minimum height of 30 ft. SVENGINE2 stack parameters are restricted to a maximum diameter of 16 inches and minimum height of 34.5 ft. Stack heights are reviewed in the site inspection report.

MAERS

MAERS 2017 submittal was reviewed. See MAERS for details. The 2018 submittal will be reviewed during the 2018 MAERS season.

MACES

MACES Facility and Regulatory screens were reviewed. The facility description was updated to add information to the description.

COMPLIANCE DETERMINATION

Based on the records review, N6104 Breitburn Operating Elmer Fudd 1 CPF appears to be in compliance with PTI 662-96A.

NAME Becky Radulski

DATE 12/1/17

SUPERVISOR SN