DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N618342338

FACILITY: Riverside Energy Michigan, LLC - Chester 7		SRN / ID: N6183		
LOCATION: Chester 7 - NE/	NE/4 Sec 12 T29N R3W, OTSEGO LAKE	DISTRICT: Cadillac		
CITY: OTSEGO LAKE		COUNTY: OTSEGO		
CONTACT: Natalie Schrader, Technical Assistant		ACTIVITY DATE: 11/02/2017		
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: 2018 FCE	······································			
RESOLVED COMPLAINTS:				

2018 FCE, site inspection and records review.

Nine SRW, Inc. facilities were purchased by Riverside Energy Michigan on June 1, 2017. Seven of those facilities have SRN's and are under the AQD's purview. The Chester 7 (SRN N6183) is one of these and operates under PTI (520-96) with respect to air pollution regulations.

At the time of the inspection there was light rain, calm winds and the temperature was 43 degrees. Equipment observed on site included two tanks, one glycol dehydrator and two engines, both of which were operating. EUENGINE01 is a Caterpillar 3408NA engine and EUENGINE02LE is a Caterpillar 399 TA engine. There were no visible emissions from either of the engine stacks. EUENGINE02LE is equipped with an emission control device. The engine information is as follows:

		ID	RPM	Pressure	Catalyst Temp In	Catalyst Temp Out
EUENGINE01	Caterpillar 3408NA	GCS6013	1674	70 psi	747	718
ENGINE02LE					NA	NA

Air Fuel Ratio Controller	O2 milli amps	Stepper Motor
Left	0.052	57
Right	0.039	25

EUENGINE01 readings indicate the Catalyst outlet temp is slightly cooler than the inlet temp. This is an abnormal condition based on typical operation of this type of control device and the monthly records for this facility. I notified Riverside Energy Michigan of my observation on 11/14/2017.

The glycol dehydrator was operating and did not appear to be equipped with a control device. Odors from the glycol dehydrator were mild. Aside from facility wide emission limits the PTI does not contain any Special Conditions (SC) regarding the glycol dehydrator.

- SC 13. limits emissions of CO, VOC and NOx each to 89 tons per year. Records provided following the inspection indicate actual source wide emissions were 32.63, 10.04, and 19.03 tons respectively for the most recent 12 month rolling time period.
- SC 14. limits HAP emissions to 9 tpy for a single HAP and 22.5 tpy for all HAPs. The records show zero HAPs emissions for this period.
- SC 15. Records of NOx, CO, VOC and HAP emissions are kept and made available to the AQD.
- SC 16. Monthly fuel consumption records were provided; there is not a permit limit on fuel consumption. The facility does not process crude, condensate, or truck hydrocarbon liquids. Glycol circulation records are kept.
- SC 17. Records of monthly gas processed are kept. See attached records.

- SC 18. MAERS is reported annually. The 2016 MAERS reported Engine 1 emissions as follows: CO 7 tons, NOx 11.7 tons, VOC 2.4 tons.
- SC 19. Records of equipment maintenance were provided. They included routine repairs and other repairs that are not likely to generate significant air emissions. Also included are monthly catalytic converter readings and portable emissions monitor testing.
- SC 20. The facility does not process crude or condensate, this is an Antrim facility.
- SC 21. Records do not indicate the need or occurrence for any bypass of the control devicee.
- SC 22. The facility is not subject to 40 CFR Part 60 Subpart KKK as gas is not fractionated here.
- SC 23. AQD has not requested emissions testing.

As a result of this Full Compliance Evaluation, the Chester 22 CPF appears to be in compliance with PTI 699-96 and the Air Pollution Control Regulations with the possible exception of malfunction of the catalytic converter on EUENGINE02LE. Additional information regarding this issue has been requested.

NAME

DATE 11-14-17 SUPERVISOR