

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

N624236572

FACILITY: HRF Exploration & Production - Walking Buck		SRN / ID: N6242
LOCATION: NW SE SE, T29N-R5E, Section 9, FLANDERS		DISTRICT: Gaylord
CITY: FLANDERS		COUNTY: ALPENA
CONTACT: Brad Musser , Operation Manager		ACTIVITY DATE: 09/01/2016
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2016 Site Inspection.		
RESOLVED COMPLAINTS:		

SRN: N6242. HRF Exploration, West Ossinekee 9 CPF.

Directions: The facility is located in Alpena County, Ossineke Township. From M65 turn west on Beaver Lake Park Road (*not* Beaver Lake Road) travel about one mile then turn south-ish onto Broad Road. Drive past pillars with two stone deer into Beaver Lake Hunt Club. Drive past the Red Barn, then the Old Barn, over the dam, past the old truck on the hill. If the gate is locked, walk the last ¼ mile, take the 2-track to the right.

FYI, at the gate a different 2-track goes to LINN's Snowplow/Broad CPF, SRN P0148 which is a minor. Plan to stop into LINN's facility when scheduling a site inspection at HRF.

Application/Permit: This is an Antrim gas facility. Permit 50-98C was issued January 26, 2012 and includes a glycol dehydrator and three engines.

Malfunction Abatement Plan (MAP): On February 29, 2012 AQD approved the MAP. The MAP includes three lean burn engines.

Other:

The permittee's records identify the engines with emission unit names other than the names in the permit. Per communication with Brad Musser at HRF, the table below matches the permittee's names with the AQD permit names.

AQD staff will request the permittee update their records to match their names with the AQD permit names.

Equipment	Unit No.	Name in PTI 50-98C	Found in Building
Compressor Superior 2408 GTL	15	EUENGINE1	Building with 2 engines (no separators); located south end
Compressor Superior 2408 GTL	10	EUENGINE2	Building with 1 engines (separators in building)
Compressor Cat 3516 LE	21	EUENGINE3	Building with 2 engines (no separators); located north end

MAERS 2016:

Reported MAERS emissions were below the permitted limits.

The report identifies emission units with a naming structure other than the naming structure in the permit. For the upcoming MAERS, AQD staff will request the permittee update their records to match their names with the AQD permit names.

Pollutant	Permit Limit	Equipment
1. NO _x	11.5 tpy	EUENGINE1
2. CO	24 tpy	EUENGINE1
3. NO _x	11 tpy	EUENGINE2
4. CO	23 tpy	EUENGINE2
5. NO _x	23 tpy	EUENGINE3
6. CO	21 tpy	EUENGINE3

Pollutant	MAERS Reported Emissions Tons	Equipment Name in MAERS
1. NO _x	8.1	EUCOMP15 EUENGINE1
2. CO	17.03	EUCOMP15 EUENGINE1
3. NO _x	5.02	EUCOMP10 EUENGINE2
4. CO	10.5	EUCOMP10 EUENGINE2
5. NO _x	14.3	EUCO EUENGINE3MP21
6. CO	13.3	EUCOMP21 EUENGINE3

MACES:

- Facility Information was reviewed and no change was made.
- Regulatory Info was reviewed and the following change was made:
 - Subject To was updated to include 40 CFR Part 63 Subpart HH.

Brochure: The inspection brochure will be forwarded to the permittee via email with the site inspection notes.

Compliance: A review of AQD files and MACES report generator show no outstanding violation.

Records: AQD requested records and the permittee was timely in submitting the records. AQD staff will request the permittee update their records to match their names with the AQD permit names.

Inspection: During the site visit, Bruce from HRF was on site. There are three engines onsite.

EUENGINE1 (Unit No. 15) and EUENGINE2 (Unit No. 10) are found in the building closest to the chain length fence. Both engines operated during the site visit and neither engine had visible emissions. Neither engine has a catalytic converter.

EUENGINE1's (Unit No. 15) skid ID was not found. Unit No. 15's had 1142 RPMs.

EUENGINE2's (Unit No. 10) skid ID is NGCS 19. Unit No. 15's had 1255 RPMs.

EUENGINE3 (Unit No. 21) is found an alternate building. This a lean burn engine. The engine did not operate during the site visit.

EUENGINE3's (Unit No. 21) skid ID is 1596. The intake air has an alternate inlet stack which is disconnected. Bruce said Unit No. 21 typically operates in the winter.

Also on site are one glycol dehydrator for all three engines, two large tanks in a retaining area, one tank that was unhooked.

Permit Conditions:

EUDEHY01 & MACTS

The facility's HAP PTE is below 10/25 tpy for individual/total HAPs making the facility a true minor for HAPs and making the facility an area source for this MACT:

- **40 CFR Part 63 Subpart HH, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.**

Although the EPA has not delegated this Subpart to MI AQD, permit 50-98C includes glycol dehydrator conditions in table EUDEHY01.

VI.3. The permittee submitted records to show compliance with this monitoring and recordkeeping condition including gas analysis showing benzene was non-detect.

FGENGINES

I. Emission Limits

The records provided identify emission units with a naming structure other than the naming structure in the permit. AQD staff will request the permittee update the record "Engine Specification Calculations Spreadsheet" with the AQD emission unit names.

Records show the NOx and CO emissions are below the permitted limits.

II. Material Limits.

The records provided identify emission units with a naming structure other than the naming structure in the permit. AQD staff will request the permittee update the record "Monthly Fuel Usage Database" with the AQD emission unit names.

The records provided show the maximum 12-month rolling fuel usages are below the permitted limit.

III. Process/Operational Restrictions.

The MAP was approved by the AQD on February 29, 2012. The MAP describes all three of the engines as Lean Burn.

The engines are lean burn and do not have control thus there is no log is hours the engines operated without control.

IV. Design/Equipment Parameters

The permittee provided natural gas usage records, thus demonstrating monitor and recordkeeping devices are present.

V. Testing/Sampling

A gas sample Certificate of Analysis from 12/1/2015 shows the Hydrogen Sulfide as ND, non-detect.

VI. Monitoring/Recordkeeping

1. Calculations were completed and made available to AQD. AQD staff will request the permittee update their records to match their names with the AQD permit names.

2. and 5. See II. Material Limits above. Monitoring and records are made of natural gas usage.

3. Documentation of ongoing engine maintenance per the MAP includes Compressor Maintenance Reports.

4. The engines do not have add-on control.

6. and 7. Records show the NOx and CO emissions are below the permitted limits.

VII. Reporting

No information was found in the permit file indicating the engine was replaced.

FG FACILITY**I. Emission Limits and V. Testing/Sampling**

A gas sample Certificate of Analysis from 12/1/2015 shows the Hydrogen Sulfide as ND, non-detect.

VI. Monitoring/Recordkeeping

Records were provided to AQD including fuel usage records.

2. HAP records are kept as formaldehyde.

Conclusions:

AQD staff will request the permittee update these records to use the AQD emission unit names:

- MAERS
- Engine Specification Calculations Spreadsheet
- Monthly Fuel Usage Database

Via onsite inspection, review of records, and discussion with Brad Musser at HRF, the permittee demonstrates compliance with the conditions of permit 50-98C and the associated MAP.

NAME

Storia Inello

DATE

9-20-16

SUPERVISOR

