

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N695653949

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| FACILITY: Paxton Resources | | SRN / ID: N6956 |
| LOCATION: SE SE NW Section 10 T30N R3W, BAGLEY TWP | | DISTRICT: Cadillac |
| CITY: BAGLEY TWP | | COUNTY: OTSEGO |
| CONTACT: | | ACTIVITY DATE: 05/13/2020 |
| STAFF: Kurt Childs | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Compliance Inspection. | | |
| RESOLVED COMPLAINTS: | | |

N6956 Paxton Resources BlueLite CPF Minor Source Compliance Inspection

I conducted a compliance inspection including site inspection and records review of the Paxton Resources BlueLite CPF located in Livingston Township, Otsego County. The facility is located on private property north of Mcoy Rd, just outside of Gaylord. There is no sign at the driveway and there are additional oil and gas facilities also located on this property including two Breiburn CPFs, the Bagley East and the Livingston 36. Neither of the Breiburn facilities were operating. The Paxton Resources BlueLite CPF was operating at the time of the inspection.

The inspection was conducted on May 13, 2020 to determine compliance with PTI 51-01 as well as applicable state and federal regulations. There were no visible emissions and only mild odors from the glycol dehydrator still vent present at time of inspection.

Equipment at the facility included a Caterpillar 3516 LCTA compressor engine that is not equipped with a catalytic converter. There is one glycol dehydrator. There is no tank farm at this facility.

The Caterpillar 3516 LCTA low emission compressor engine has a PTE of 14.5 tpy with no catalytic converter. Therefore it is a minor source. MAERS is not required due to actual emissions for this minor facility being below reporting levels.

A PM-MAP is not required in PTI 51-01. Preventative maintenance activities were included in the application. Daily operation logs were reviewed at the facility and described operating conditions consistent with those that were observed during the inspection.

The glycol dehydrator at the facility is exempt from permitting requirements per R 336.1288(2)(ii) since it processes gas from the Antrim formation.

PTI 51-01 - SPECIAL CONDITIONS

2. (volume natural gas burned) The facility provided records of natural gas fuel usage. As of May 2020 their 12 month rolling usage was 32.302 MMcf. Records are attached.
3. (NOx emissions, monthly and 12-month rolling) The facility provided records of NOx, CO and VOCs emissions. Emission factors for CO and NOx are based on a portable analyzer test. Ras of May 2020 rolling 12-month NOx is 7.459 tpy, CO is 6.938 tpy. PTI 51-01 only contains a NOx limit of 6 pounds per hour. If the engine operated 8760 hours, hourly emissions would be 1.7 lbs/hr.
4. PTI 51-01 required that the stack be raised to 30' which is 3' above the roofline. Based on visual estimate, the stack appeared to be at least 30 feet high and 10 inch diameter. Exhaust gases are discharged unobstructed vertically upwards to ambient air.

As a result of this inspection the source appears to be in compliance with PTI 51-01 and the Air Pollution Control Rules.

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| NAME  | DATE 5-13-20 | SUPERVISOR  |
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