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

N719074638

FACILITY: VCP Michigan - Vienna 6-7		**SRN / ID:** N7190
LOCATION: NW NE SW SEC 7, VIENNA TWP		**DISTRICT:** Cadillac
CITY: VIENNA TWP		**COUNTY:** MONTMORENCY
CONTACT:		**ACTIVITY DATE:** 10/30/2024
STAFF: Tammie Puite	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Site Inspection to become familiar with the facility as the new assigned inspector.		
RESOLVED COMPLAINTS:		

The VCP Michigan, LLC, Vienna 6-7, is a natural gas central processing facility (CPF) located in North Chester Township, Otsego County. To access this facility, From M-32, go 8.5 miles North on Merdian Line Road, it becomes Black River Road at County Road 622. The facility is on the East side of the Road just south of Growler Club Road. This facility processes sweet natural gas from low-pressure Antrim formation wells that flow to the facility via buried flowlines. Upon reaching the facility, the gas is compressed and directed through a Tri ethylene 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) numbers 226-02B and165-20. PTI 226-02B was issued in May of 2018. VCP received PTI 165-20 in January of 2021. The intent of this PTI was to allow VCP to change out the engine detailed in PTI 226-02B. This engine change out was performed on February 23, 2021. I put in a request for PTI 226-02B to be voided on November 19, 2024.

An onsite inspection was performed on October 30, 2024. Upon arrival on site, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation, and from the monthly log onsite, has been in full operation for the month of October. The Tri ethylene glycol dehydrator equipment has a small leak, that was being captured via secondary containment. All other housekeeping issues met with industry standards.

Equipment Onsite:

CAT 3408 NA, 255HP, 1800 RPM, 8 Cylinder Engine Serial # 6NB01881, Skid # 102259 – Uncontrolled via Stack (165-20)

- No catalytic emission control
- Operating at 1418 RPM
- Oil Pressure – 76 psi – from onsite log

400 BBL Brine Storage Tank – Direct Vent to Air - exempt from permitting under R 336.1284(2)(e)

200 BBL +/- Slop Storage Tank – Direct Vent to Air - exempt from permitting under R 336.1284(2)(e)

Tri ethylene Glycol Dehydrator – Via Stack - exempt from permitting per R336.1288(2)(b)(ii). This equipment was leaking.

- Dehy Tower PSI 650
- Dehy Tower Temp 80ºF
- Reboiler Temp 373ºF
- Glycol Pump SPM 6

3 separators – Direct Vent to Air

1 scrubber

<u>Permit to Install 165-20</u>:

NOx emissions from the engine are limited to 63.2 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. I will submit a seperate records request with the company to determine compliance with this limit.

The engine is only equipped to burn natural gas. Also, as required, it is equipped with a device to measure the amount of natural gas being used for fuel.

VCP is required to develop and implement a Malfunction Abatement Plan (MAP) for the engine. This plan was submitted in March of 2021 and approved in April of 2021, but I can not find a copy in the file. I will follow up with the company for a copy.

No stack testing has been required to be performed at this facility in the last 12 months.

Records of maintenance activities at this facility are being kept. These records were visible on site, and have been provided in previous requests.

VCP is allowed to swap out this engine for a equal or lesser emitting engine. The facility must notify the agency if the engine has been swapped out. No such notification has been received. The engine appears to be the engine described in the current PTI.

The exhaust stack for the engine is to have a maximum diameter of 8 inches and a minimum height above ground of at least 46 feet. This stack appears to meet these parameters. The stack is equipped with a muffler for noise control. It does not have any catalytic control device.

The engine is to comply with the provisions of 40 CFR Part 63, Subpart ZZZZ. By complying with the provisions listed in the PTI, the engine is in compliance with the MACT.

At the time of this inspection, this facility appears to be in compliance with their air permitting.

Image 1(Image of CPF) : Exterior of CPF and Dehy is outside.

Image 2(Dehy) : Image of Dehy System

Image 3(AST Tanks) : 1 - 400 BBL Brine Tank & 1-200 BBL +/- Slop Tank.

Image 4(Engine) : CAT 3408 255 HP

Image 5(Stack) : Stack going to Muffler with no Catalytic Control

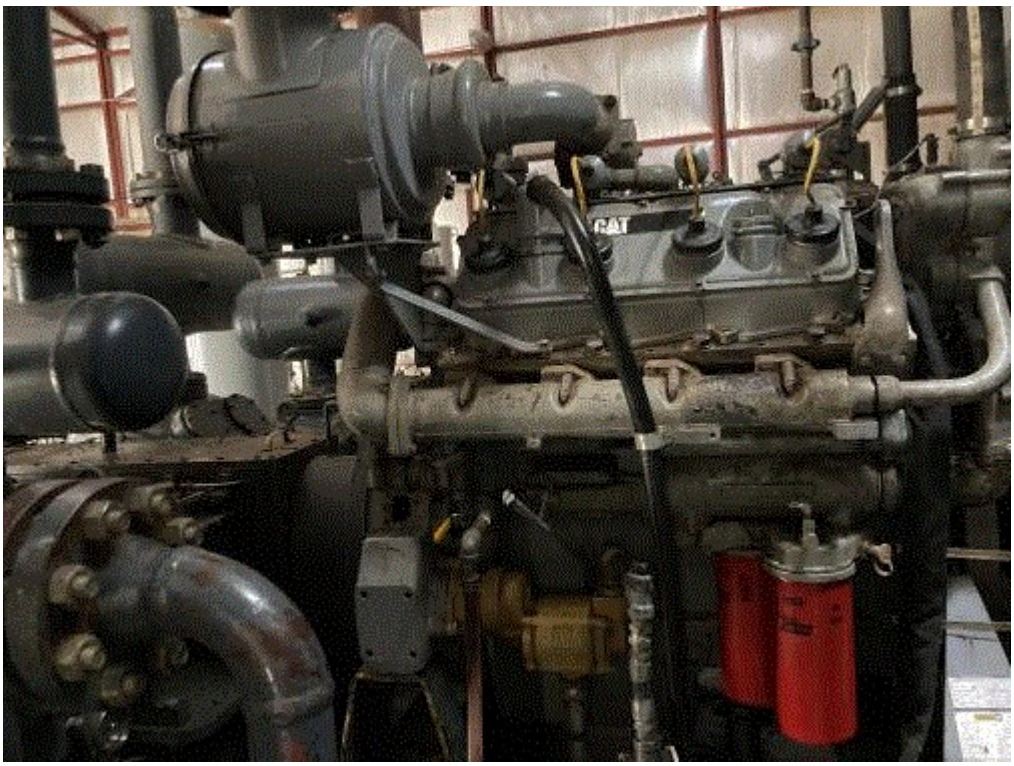

Image 6(Engine) : 8 Cylinder Engine

Image 7(Engine Tag) : SN# 6NB01881

Image 8(Dehy - Small Leak) : Shows the tank that is leaking, absorbent pads, and the leak being captured by secondary containment.

NAME _____ DATE 12-4-24 SUPERVISOR _____