

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

N746364886

<b>FACILITY:</b> RIVERSIDE - ELMER FUDD EAST CPF		<b>SRN / ID:</b> N7463
<b>LOCATION:</b> SEC 07 T28N R03E NE SE, COMINS		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> COMINS		<b>COUNTY:</b> OSCODA
<b>CONTACT:</b> Eric Hasso , HSE Advisor I		<b>ACTIVITY DATE:</b> 11/18/2021
<b>STAFF:</b> Becky Radulski	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> FY22 inspection and records review		
<b>RESOLVED COMPLAINTS:</b>		

On November 18, 2022 AQD Staff traveled to N7463 Breitburn Operating Elmer Fudd East CPF located in Clinton Township, Oscoda County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with MI-ROP-N7463-2019. AQD Inspector Becky Radulski was present at the inspection.

### LOCATION

The source is located on Boiling Springs Road, 2 miles south of the Montmorency/Oscoda County line, approximately 4 miles west of M-33. Boiling Springs Road directly connects to M-33. Traveling west on Boiling Springs, facility is located on the right.

### EQUIPMENT ON SITE

The facility consists of 2 lean burn engines – each a Caterpillar 3516 TALE 1340 hp, glycol dehydrator system and a lined tank with two 400 bbl brine tanks in a lined containment area.

The facility processes natural gas from the Antrim zone. The engines compress gas and send it to a production pipeline for further processing.

### REGULATORY DISCUSSION

The facility is a major source subject to a Renewable Operating Permit (ROP), MI-ROP-N7463-2019, because the potential to emit nitrogen oxides (NOx) is over 100 tons per year. The facility is not major for HAPs. The ROP expires January 1, 2024. An administratively complete ROP renewal application is due by June 1, 2023.

The facility was issued PTI 240-05B on 5/28/21. This permit was to remove EUENGINE3. The removal of this engine causes the facility to be an opt-out source for NOx and will no longer be subject to Title V once the removal of the engine has been confirmed and the ROP has been voided.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has been delegated to EGLE from EPA. However, the AQD is not completing compliance determinations for Subpart ZZZZ area sources at this time.

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

### INSPECTION NOTES

EUENGINE1 and EENGINE2 were operating during the inspection. EUENGINE3 has been removed from the facility. One glycol dehydration system serves the remaining engines. The dehy system was operating, no odors or VE noted.

**EUENGINE1 - Caterpillar 3516 TALE 1340 hp, also known as #1185:**

EUENGINE1 is located in the SW building, the one closest to the lined tank farm. There were several green storage tanks (oil and dehy chemicals) on stilts in containment located outside the building. The stack has a muffler, no control, and what appears to be a silencer. Inside the building were red used oil tanks and hydraulic oil tanks on stilts in containment. There was also a dehy and o/w separator.

engine oil pressure      57 psi

rpm                              1118

**EUENGINE2 - Caterpillar 3516 TALE 1340 hp, also known as #1106:**

EUENGINE2 is located in the N building. The stack has a muffler, no control, and what appears to be a silencer. Inside the building was a red used oil tank, several blue oil drums in containment. There was also an o/w separator.

engine oil pressure      55 psi

rpm                              1109

**No VE or odor from any compressor engine stack or glycol dehydrator system.**

The engine stacks are each required to have a minimum height of 39 feet, maximum diameter of 16 inches – based on visual observation, the stacks appear to meet this condition.

### **RECORDS REVIEW**

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

**Source-Wide (SW) – all equipment at site**

**SC I.1. The facility has a SW limit of 136 tons/NOx per year, based on 12 month rolling. Records provided indicate the current 12 month rolling is 26.6 tons NOx, which is below the permitted limit.**

**SC 1.2. The facility has a SW limit of 98.7 tons/CO per year, based on 12 month rolling. Records provided indicate the current 12 month rolling is 25.3 tons CO, which is below the permitted limit.**

**SC III.1. The facility confirmed it burns only sweet natural gas.**

**SC VI.1. The permittee calculates and maintains monthly and 12-month rolling CO and NOx emission calculations records. Records were provided up request.**

**EUDEHY – glycol dehydration system processing gas from the Antrim formation zone, contains a 125,000 BTU/HR heat input natural gas fired burner**

**SC VI. Monitoring/Recordkeeping - The facility is subject to 40 CFR Part 63 Subpart HH. All indications are the facility is in compliance with the requirements of the subpart.**

**FGENGINES – Three natural gas-fired reciprocating engines. Caterpillar model 3-3516 TALE, 1340 horsepower each (EUENGINE3 has been removed)**

**SC I.1, I.2 - Each engine in FGENGINES has NOx and CO limit. Records were requested and provided as follows:**

Engine:	NOx Limit (tpy, 12 mo rolling)	NOx Reported (tpy, 12 mo rolling)	CO Limit (tpy, 12 mo rolling)	CO Reported (tpy, 12 mo rolling)
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EUENGINE1 45.3 13.5 32.8 12.6

EUENGINE2 45.3 13.1 32.8 12.7

EUENGINE3 45.3 0 32.8 0

SC III.1, VI.2 MAP - The facility has an AQD approved MAP. Approval was given on April 24, 2007. Daily maintenance records were reviewed onsite. Compressor maintenance logs were requested and provided. Records show on-going engine maintenance. The engines are lean burn and do not have control. An updated MAP will be provided following issuance of PTI 240-05B.

SC. III.2 and 3, VI.3. The engines do not have add-on control, these conditions are not applicable.

SC V.1. The most recent stack test took place in May 2019. The facility met the conditions of the ROP.

SC VI.1, VI.4 Natural gas usage is monitored and recorded. Fuel use records were provided. EUENGINE 1 and EUENGINE2 used 46,652 MMCF and 45,166 MMCF respectively. The permit does not limit fuel use.

SC VI.5 and 6. NOx and CO records are kept on a monthly and 12-month rolling basis. SC VIII. 1, 2 and 3. Per a visual estimate, the stacks meet the permit requirements.

**COMPLIANCE DETERMINATION**

Based on the scheduled inspection, N7463 Riverside Elmer Fudd East CPF appears to be in compliance with ROP-MI-N7463-2014 and PTI 240-05B. Based on the removal of EUENGINE3, the ROP will become void and the facility will become an opt out source regulated under PTI 240-05B.

NAME Beky Radzicki

DATE 7-6-23

SUPERVISOR Sharon Nixon