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

N756131404		
FACILITY: BREITBURN OPERATING LP - Livingston 21		SRN / ID: N7561
LOCATION: SW4 SW4 SEC 21, T31N, R3 W, LIVNGSTON TWP		DISTRICT: Cadillac
CITY: LIVNGSTON TWP		COUNTY: OTSEGO
CONTACT: Carolann Knapp, Environmental Specialist		ACTIVITY DATE: 09/24/2015
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site inspection and reco	ords review	
RESOLVED COMPLAINTS:		

AQD staff traveled to Otsego County to perform an inspection of the Livingston 21 CPF. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 347-05. The facility consisted of a compressor engine, glycol dehydrator which processs gas from the Antrim formation, and two storage tanks.

EUENGINE - 1,340 lean burn compressor engine equipped with air to fuel ratio controller. Staff were unable to determine the serial number of the engine; however, staff did note the skid in which the engine was mounted on was labeled as GCS 1202. Operating parameters observed by AQD staff are summarized below:

Engine coolant temperature: 195° F

Compressor oil temperature: 215° F

Compressor oil pressure: 60 psi

Engine oil pressure: 60 psi

Operating rate: 1,379 rpm

1. EMISSION LIMITS - NOx and CO emissions are limited to 45.4 and 33.4 tons per year based on a 12 month rolling time period, respectively. Emission records submitted by the company indicates the highest 12 month rolling emissions for the time period between September 2014 and August 2015 occurred in August 2015. NOx and CO emissions at that time were 32.2 and 15.3 tons, respectively.

2. MATERIAL LIMITS - There are no material limits associated with this emission unit; therefore, this section is not applicable.

3. PROCESS/OPERATIONAL LIMITS - The facility is required to implement a preventative maintenance/malfunction abatement plan (PM/MAP) for the compressor engine. AQD staff review of files indicates that the PM/MAP was submitted by the company and was approved by the AQD in 2007.

4. EQUIPMENT RESTRICTIONS - There are currently no conditions which apply to this emission unit as the equipment is not equipped with a pollution control device.

5. TESTING - NOx and CO testing is only required upon request by AQD staff. AQD staff have not requested testing at this time.

6. MONITORING - During the on site inspection, AQD staff observed that fuel usage of the compressor engine is monitored electronically.

7. RECORDKEEPING/REPORTING/NOTIFICATION - NOx and CO emission calculations were made available to AQD staff upon request (attached). These records were reviewed by AQD staff and were determined to be accurate and complete.

8. STACK/VENT RESTRICTIONS - AQD staff observed that the compressor engine stack was installed in accordance with the conditions of the Permit to Install.

FGFACILITY - All process equipment at the facility including equipment covered by other permits, grandfathered equipment and exempt equipment.

1. EMISSION LIMITS - NOx and CO emissions from the facility are both limited to 89 tons per year based on a 12 month rolling time period. Emission calculations submitted by the company for the time period between September 2014 and August 2015 indicates compliance with the limits with the highest emissions occurring in August 2015. NOx and CO emissions during that time were 32.4 and 15.4 tons per year based on a 12 month rolling time period, respectively.

2. MATERIAL LIMITS - Sweet natural gas is the only fuel allowed to be burned at the facility. The most recent gas analysis (September 2015) indicates that the hydrogen sulfide content of the natural gas is 0 based upon a stain tube determination.

3. PROCESS/OPERATIONAL LIMITS - There are no process or operational limits associated with this flexible group; therefore, this section is not applicable.

4. EQUIPMENT RESTRICTIONS - There are no equipment restrictions associated with this flexible group; therefore, this section is not applicable.

5. TESTING - There are no testing requirements associated with this flexible group; therefore, this section is not applicable.

6. MONITORING - There are no monitoring requirements associated with this flexible group; therefore, this section is not applicable.

7. RECORDKEEPING/REPORTING/NOTIFICATION - NOx and CO emission calculations were submitted to AQD staff upon request (attached). These records appeared to be adequate and complete.

8. STACK/VENT RESTRICTIONS - There are no stack or vent restrictions associated with this flexible group; therefore, this section is not applicable.

CONCLUSION - Based upon the on-site inspection and records review, AQD staff considers the facility to be in compliance with Permit to Install No. 347-05,

NAME

SUPERVISOF