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

N825830409

FACILITY: CHEVRON MICHIGAN, LLC - APPLE ORCHARD CPF		SRN / ID: N8258
LOCATION: T29N, R4E Section 10, NE SW SE, RUST TWP		DISTRICT: Gaylord
CITY: RUST TWP		COUNTY: MONTMORENCY
CONTACT: Natalie Schrader , Environmental Specialist		ACTIVITY DATE: 07/24/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and record review		
RESOLVED COMPLAINTS:		

On July 24, 2015, I inspected the Chevron Apple Orchard facility. Natalie Schrader of Chevron had sent me records for this facility in response to an earlier email.

The facility appears to be in compliance with its permit. The records provided meet permit requirements.

Ms. Schrader told me this facility is not operating. Its production has been rerouted to another CPF. All the equipment for the Apple Orchard CPF is on site but they plan to relocate it to other facilities. However, since the equipment is still on site I do not recommend voiding the permit at this time.

Permit 80-09, glycol dehydrator table EUDEHY1, condition VI.1, allows showing exemption from the more stringent pollution control requirements of 40 CFR 63 Subpart HH by demonstrating that the gas processed through the glycol dehydrator is less than 85,000 cubic meters per day. 85,000 cubic meters is about 3000 Mcf. Production data for March, 2015 (attached) shows gas production with the highest production in the month 351 Mcf on March 8th. If all this gas was processed through the dehydrator (which is likely) the gas processed is still below 85,000 cubic meters per day. I conclude this facility meets the exemptions in Subpart HH.

Table EUENGINE1, Condition I.1, sets a NOx limit of 64 tons per 12 month rolling time period. Emissions calculations (attached) indicate the highest emissions per 12 month period from January 2012 through April 2015 was 36 tons. This meets the limit.

Condition I.2 sets a CO limit of 70 tons per year. Emissions calculations (attached) indicate the highest emissions per 12 month period from January 2012 through April 2015 was 61 tons. This meets the limit.

The emissions data shows no emissions since October 2014. Apparently this was when the production for this facility was rerouted to another CPF.

Condition III.1 requires a Malfunction Abatement Plan. We have an approved MAP on file.

Condition III.2 limits operation without the attached pollution control device, if any, in place to no more than 200 hours per year. This condition does not apply because this facility was permitted without a pollution control device, and emissions have always been calculated assuming there is no pollution control device. There is, in fact, a catalytic oxidizer in place, but Chevron has stated that it does not work. Chevron has not claimed any pollution reduction from it, and meets the emission limits without it. Although this situation is unusual in my judgment it is legal.

Various special conditions in Section VI of the permit require keeping records of natural gas fuel usage, maintenance activities, NOx emissions and CO emissions. Example records of these items are attached.

Condition VIII.1 requires a stack maximum exhaust diameter of 12 inches and a minimum height of 47 feet. Judging by the use of crude, approximate geometry, the stack appeared to be about 50 feet high. Stack diameter was about 12 inches.

Table FGFACILITY, conditions I.1 and I.2, set NOx and CO limits of 89 tons each for the entire facility. Emissions estimates provided by Chevron to the Emission Reporting System indicate the facility is meeting these limits.

Condition II.1 forbids burning sour gas at the facility. There is no evidence of sour gas. The facility processes Antrim Formation gas; sour gas is very rare in the Antrim Formation.

COMMENTS:

When I arrived on site the facility was silent. The compressor engine was not operating and the glycol dehydrator was cold. This seems to confirm Ms. Schrader's statement that the facility is not operating at this time.

There was no opacity and no odor. The equipment on site appeared to be in good condition.

The facility includes two 400-barrel size tanks which appear to be brine tanks. They are inside a well maintained lined berm.

There is an oval metal tank, probably for coolant, near the compressor engine's radiator.

Inside the compressor shed I found one medium sized compressor with a catalytic oxidizer. (Note that Chevron has informed us that this thermal oxidizer does not work, and the engine was permitted to operate without one.) There were two 300 gallon size drum on stilt tanks which appeared to contain lubricating oil. There was one larger drum style tank on the ground; it was painted orange and labeled as for waste oil.

The glycol dehydrator has a Wenco flame arrested burner which according to its builder's plate has a capacity of 125,000 BTU (per hour, presumably). It was not operating. It was cold. The burner stack appeared to be about 6 inches diameter and 24 feet high. I didn't see the glycol still vent; it may have exited the building through the roof.

NAME William J Rogers Jr. DATE 7/31/2015 SUPERVISOR