

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

P013738922

FACILITY: SRW Inc - Charlton 19		SRN / ID: P0137
LOCATION: 9100 Finnegan Rd, JOHANNESBURG		DISTRICT: Gaylord
CITY: JOHANNESBURG		COUNTY: OTSEGO
CONTACT: JOHN STEGMAN , FIELD SUPERINTENDENT		ACTIVITY DATE: 03/15/2017
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY17 scheduled inspection		
RESOLVED COMPLAINTS:		

AQD Staff traveled to P0137 SRW Charlton 19 CPF located in Charlton Township, Otsego County, for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 148-10. This is an opt out permit.

The Charlton 19 CPF is a natural gas central production facility (CPF). Natural gas produced at remote wells is transported to the site at low pressure by pipeline. The natural gas enters a compressor, driven by a natural gas fired engine, where it is compressed from approximately 0 psig to approximately 1100 psig. After compression, the natural gas enters a glycol dehydration unit which removes water vapor from the gas stream. The gas is expected to contain 5-20 ppm hydrogen sulfide, which will be removed by an iron sponge prior to dehydration.

LOCATION

The facility is located at 9100 Finnegan Rd - SW of Johannesburg, on the north side of Finnegan Rd, approximately ¾ miles west of Gingell Rd. The facility was not fenced or gated.

Building signed: SRW Charlton 19; SW/4 SW/4 Section 19 T30N R1W; Charlton Township (Central); Otsego County; In case of emergency 989-732-0351.

REGULATORY DISCUSSION

PTI 148-10 was issued August 26, 2010. The permit is for one natural gas engine (identified in application as Caterpillar G3408NA, 255 hp) and one dehydration unit that processes Antrim formation natural gas. There are also 2 storage tanks in a containment berm.

This is an opt out permit due to SC VII.1 of the permit which allows for replacement of the engine with an equivalent-emitting or lower-emitting engine. The replacement engine can be with or without control.

The facility is not major for HAPS.

The engine is NOT subject to NSPS Subpart JJJJ, because the engine manufactured date of 1-29-96 does not meet the applicability criteria in Subpart JJJJ.

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

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

INSPECTION NOTES

The facility contains 1 large building with a compressor engine, oil-water separator, 2 iron sponges, and dehy system, as well as 2 storage tanks.

The engine was operating during the inspection. The engine is identified on the maintenance clip board as a Cat 3408NA, Unit 302664-018. The skid is labeled as CO2664. No VE or odor was noted from the exhaust. The exhaust stack has a muffler. No control was noted. The last date on the inspection clip board was December 29, 2016. During the inspection the unit was operating with RPM of 1520.

The glycol dehydrator is located on the north side. It emitted steam, no odor. A red methanol tank, approximately 100 gallons, is on the exterior wall, no containment. The facility has been asked to confirm the wells into the facility are only Antrim Formation.

Two iron sponges are located on the west side of the building. There is a vertical pipe connected to the southern iron sponge that initially appeared to be an exhaust pipe. On closer look, the pipe is NOT connected to anything; it appears to be an empty channel.

Inside the facility were several containers for used oil and engine oil, located inside containment.

Outside the facility was a concrete containment area that contained two tanks, approximately 400 bbl and 150 bbl. Neither tank was labeled. Both storage tanks have 'T' vents on top. The company has been asked for actual tank sizes and contents. In addition, on the southern exterior wall, was a red tank, unmarked, approximately 200 gallons, no containment.

The stack was viewed from several viewpoints. Based on visual estimate using the bolt pattern on the side of the building, the stack appears to meet the height and diameter requirements (30 feet minimum height, 5 inch maximum diameter).

MAERS

The 2016 emissions will be reviewed separately. Any issues will be noted in MAERS and resolved separately.

MACES

MACES was reviewed. Updated the description to reflect the equipment. Updated Contact information to assign appropriate facility contact. Updated MACT screen to include Subparts ZZZZ and HH.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, P0137 SRW Charlton 19 CPF appears to be in compliance with PTI 148-10. Records are reviewed separately.

NAME Becky Radulski DATE 3/17/17 SUPERVISOR SN