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

P014873854

FACILITY: RIVERSIDE - SNOWPLOW CPF		**SRN / ID:** P0148
LOCATION: SW 1/4 NW 1/4 SW 1/4 SEC 10 T29N R5E, OSSINEKE		**DISTRICT:** Gaylord
CITY: OSSINEKE		**COUNTY:** ALPENA
CONTACT: Natalie Schrader , Compliance Coordinator		**ACTIVITY DATE:** 08/07/2024
STAFF: Becky Radulski	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: inspection and records review		
RESOLVED COMPLAINTS:		

On August 7, 2024, AQD Staff traveled to P0148 Riverside Broad Snowplow Central Processing Facility (CPF) to conduct an inspection to determine compliance with permit to install 164-10A. This is an opt out permit.

LOCATION

The facility is located in Section 10, T29N, R5E, Ossineke Township, Alpena County, Michigan. This facility is located within the Beaver Lake Hunt Club. An access code was provided by Natalie Schrader of Riverside (via operator Josh Major 231-631-3370) however was not needed during this inspection. To get to the facility, the following detailed notes are included from a previous inspection: District Staff traveled south on M-65 from it's intersection with M-32. Turn west (to the right) and travel on Beaver Lake Park Road to its intersection with Broad Road (approximately 1 -mile). Turn south (left) and travel approximately 0.27-miles where the road forks. The Facility is located on the western fork/drive (Beaver Creek Road). Drive thru the gate pillars to the right at the end of Broad Road, and follow the road to the south and west into the hunt club, following the more well used roads. The hunt club clubhouse/offices are located in a large green and white barn to your right and the locked gate is located immediately after. You will pass a small barn on your left after passing through the gate, and cross over a narrow wooden topped dam as you travel to the Facility. A tall deer fence divides the Beaver Lake Hunt Club from the Turtle Lake Hunt Club located on the west side of the fence and HRF West Ossineke (SRN N6242).

REGULATORY DISCUSSION

PTI 164-10 was issued on 9/10/10 and voided with the permit modification for PTI 164-10A. The permit was for two compressor engines.

PTI 164-10A was issued on 12/17/20 and is currently active. The permit is for two engines noted as EUENGINE1-2021 and EUENGINE2, as well as EUDEHY. Both engines are noted in their description as having a 3-way catalyst. The permit modification allows for the original EUENGINE1 to be replaced with EUENGINE1-2021, as well as adding in the conditions for EUDEHY.

EUDEHY is subject to 40 CFR Part 63, Subpart HH – NESHAP from oil and natural gas production facilities.

EUENGINE1-2021 is subject to 40 CFR Part 63, Subpart ZZZZ – NESHAP for Reciprocating Internal Combustion Engines (RICE). Per the 164-10A eval form, the high level requirement to comply with Subpart ZZZZ was not included in the permit at time of issuance, however the permit engineer notified the company of the requirement.

EUENGINE2 is subject to 40 CFR Part 60, Subpart JJJJ – NSPS for Spark Ignition Engines.

INSPECTION NOTES

During the inspection, the sky was partly cloudy, 72 degrees Fahrenheit, with a slight breeze of approximately 5 mph out of the southeast. The engines were operating during the inspection with no odors or visible emissions observed. The facility may require a code to enter so it is advised to contact Riverside for the Hunt Club code prior to visiting.

The facility consists of a two engines and a glycol dehydrator. A small lined tank farm with 1 tank less than 400 barrels was noted. In addition there are several used oil, oil and glycol tanks in containment.

EUENGINE1-2021 was identified as a Caterpillar 3406NA 215 hp engine. There was a catalyst observed on the engine exhaust. The engine was operating at 57 PSI oil pressure and 1515 RPM. The catalyst inlet and outlet temperatures were noted as 1010 and 1021 degrees Fahrenheit, respectively.

EUENGINE2 was identified as a Caterpillar 3306 TA 203 hp engine. There was a catalyst observed on the engine exhaust. The engine was operating at 60 PSI oil pressure and 1410 RPM. The catalyst inlet and outlet temperatures were noted as 703 and 850 degrees Fahrenheit, respectively.

RECORDS REVIEW

EUDEHY – this table has standard language for Subpart HH. The facility indicates that they are below requirements needed to comply with HH, with annual production showing less than 3,001 MMCF/day production.

FGENGINES

Emission Limits – the nitrogen oxides (NOx) and carbon monoxide (CO) emissions are limited in the permit. The facility provided records demonstrating compliance with the permitted limits:

EUENGINE1-2021 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	3.2	0.09	1.11
CO	6.4	0.01	0.14

EUENGINE2 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	5.8	0.03	0.45
CO	1.0	0.01	0.10

Records are as of July 2024. Records provided demonstrate compliance with permitted requirements.

Material Limits – the facility is not permitted to burn sour gas in FGENGINES. Sour gas is defined as any gas containing more than 1 grain of hydrogen sulfide (H2S) or more than 10 grains of total sulfur per 100 standard cubic feet. The facility provided records demonstrating that there is no H2S/sulfur content in the fuel.

Process/Operational Restrictions – the facility was required to submit a Preventative maintenance / malfunction abatement plan (PM/MAP) and has an approved PM/MAP on file. The facility submitted records to meet the requirements of the PM/MAP. These records include engine and catalyst maintenance and downtime and emission testing results. No issues were noted in review of the records. The catalyst inlet and outlet temperatures meet the conditions of the PM/MAP, being within the range and showing a heat increase across the catalyst.

Testing/Sampling – testing is only required upon AQD request, of which no request was made. The facility did however provide data from an emissions analyst.

Monitoring/Recordkeeping – the facility is required to monitor and record natural gas usage, PM/MAP records, catalyst information, and NOx and CO calculations. These records have been received by AQD and no issues found. Each of these parameters was discussed above except for natural gas. The natural gas records indicate approximately 1.0 MMCF and 0.8 MMCF of natural gas are used per month for EUENGINE1-2021 and EUENGINE2, respectively.

Stack/Vent Restrictions – the stacks are each required to have a maximum of 16 inches diameter and a minimum height of 35 feet above ground. Based on engineering judgement, the stacks meet these requirements.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, P0148 Riverside Broad Snowplow CPF was in compliance with the requirements of PTI 164-10A.

NAME Becky Radulski DATE 11-8-24 SUPERVISOR Shane Nixon