

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

P055674804

<b>FACILITY:</b> NuEnergy Operating, Inc. (Zebulon 16 CPF)		<b>SRN / ID:</b> P0556
<b>LOCATION:</b> Clinton Twp., Section 16, COMINS		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> COMINS		<b>COUNTY:</b> OSCODA
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 10/09/2024
<b>STAFF:</b> Tammie Puite	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> On-site inspection to become familiar with the source as the newly assigned inspector.		
<b>RESOLVED COMPLAINTS:</b>		

The NuEnergy Operating Incorporated, Zebulon 16, is a natural gas central processing facility (CPF) located in Clinton Township, Oscoda County. To access this facility, From M-33, approximately 1 ½ miles south of the Montmorency/Oscoda County line, turn east onto Delano Road, at the T-in-the-road turn right on Tote Road, eventually the pavement resumes, travel south about 1 mile, turn left/east on Saddleback Road travel about 1 mile, on the left is a lake, turn right on Saddleback Trail, take road to the end. This facility had a locked gate, with a ¼ mile walk in. This facility processes sweet natural gas from low-pressure Antrim formation wells that flow to the facility via buried flowlines. Upon reaching the facility, the gas is separated and compressed and directed flowlines for further processing.

I performed an inspection on this source with respect to Permit to Install (PTI) number 157-14. An onsite inspection was performed on October 09, 2024. Upon arrival on site, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation. The facility was found to have good housekeeping practices that met with industry standards.

**Equipment Onsite:**

**CAT G3406, Inline 6 cylinder, 325 HP, 1800 RPM, Unit # CM086 – Uncontrolled via Stack with a muffler, No catalytic emission control.**

- Operating at 1084 RPM
- Oil Pressure – 55 psi

A Tri-Ethylene Glycol Dehydrator was onsite, but the heater was not operating. The glycol dehydrator is exempt per R288(b)(ii).

There is a water separator and a gas separator inside the building.

There were no AST tanks onsite.

**Permit to Install 157-14:**

**EUENGINE –**

Nitrogen Oxides (NOx) emissions from this facility are not to exceed 68 tons per year. CO emission limits are not exceed 6 tons per year. Limit is based on a 12-month rolling time period as determined at the end of each calendar month. This engine is below 10 MMBTU/hr, but the potential to Emit for NOx, does not allow for it to be exempt. The permitted engine matches the engine onsite, and the engine that is reported in the annual equipment inventory matches.

The permit allows for the swap out of equal or lower emitting engines without a permit modification. The engine onsite, looks to be the original permitted engine.

A Malfunction Abatement Plan is required for this facility. A plan was previously submitted and approved in 2014. The facility is under new ownership, so I will ask that this be updated.

The engine is only equipped to burn natural gas. Also, as required, it is equipped with a device to measure the amount of natural gas being used for fuel.

No stack testing has been required to be performed at this facility in the last 12 months. Records of maintenance activities at this facility have been provided in previous requests. There were logs on site, so these records are being kept.

The exhaust stack for the engine is to have a maximum diameter of 6 inches and a minimum height above ground of at least 32 feet. The stack appears to meet these requirements. The stack is equipped with a muffler for noise control. It does not have any catalytic control device.

The facility is to comply with the provisions of 40 CFR Part 63, Subpart HHH. By complying with the provisions listed in the PTI, the facility is in compliance with the MACT. The engine is not subject to 40 CFR Part 63, Subpart JJJJ because it was manufactured prior to 2007.

At the time of this inspection, this facility appears to be in compliance with their permit. I will submit a records request to verify what equipment is onsite and that the company is keeping the correct emission records.



**Image 1(P0556)** : CPF Exterior View





**Image 2(EuEngine)** : CAT 3406, 325 HP, 1800 RPM. Operating at 1084 RPM



**Image 3(Dehy Unit)** : Tower has a PSI of 1100; Heater was not working. Notice short stack on Dehy.

NAME 

DATE 12-4-24

SUPERVISOR 