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

B558924660		·
FACILITY: Merit Energy Co Brown 7		SRN / ID: B5589
LOCATION: Collins Rd., MANISTEE		DISTRICT: Cadillac
CITY: MANISTEE		COUNTY: MANISTEE
CONTACT:		ACTIVITY DATE: 03/25/2014
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 FCE, Site ins	pection and records review.	
RESOLVED COMPLAINTS:		

I Conducted a Full Compliance Evaluation (FCE) of this facility in accordance with the District inspection plan to determine compliance with the Air Pollution Control Rules and PTI 25-05B. The Brown 7 plant previously utilized a sweetening plant for H2S removal. The sweetening plant has been shut down and iron sponges were installed for H2S removal. The AQD received written notification on 8/24/09 that the 750 hp Waukesha compressor engine had been replaced by a 300 hp electric motor.

At the time of the inspection the flare was operating and there was a small flame and no plume or opacity. There were no trucks loading or unloading at this time and no operator on-site. During the inspection I did not observe any additional excess opacity from the flare. The flare serves as a back-up control to the relief valves, tank vapor recovery unit, and fuel gas since the facility processes sour gas.

At the time of the inspection the building that formerly housed the V-12 Waukesha Compressor engine was empty. an electric motor/compressor unit was located in an adjacent building and was operating. The electric motor does not generate air emissions and there are no relevant process operating parameters to monitor with regard to air emissions.

The Dehy appears to have been removed. Both iron sponge vessels were still in place and did seem to be in operation. There are no permit conditions regarding the iron sponge as this is an enclosed process and these units are considered to not emit air contaminants.

There is also a tank battery consisting of five tanks and a vapor recovery unit that was operating at the time of the inspection. Additionally, there are five process heaters on site the largest of which is rated at 3 mmbtu. None of the heaters appeared to be operating at the time of the inspection.

Facility records were requested prior to the inspection. The records were received on 11/1/13 and indicate that the facility has met the facility wide permit requirements for NOx, CO, and VOC emissions (heaters only).

There has been no reporting required for this facility since the sweetening plant was shut down in October 2007.

The facility appears to be operating in compliance with the conditions of the permit, the sweetening plant is not operating to sweeten the sour gas, iron sponges are utilized for H2S removal, the compressor engine is as described in the permit application has been removed and replaced by an electric motor, the dehy has now also been removed. It appears that PTI 25-05B could be voided if MEC determined the Heaters meet the exemption in R 336.1282(b).

DATE 3-26-14 SUPERVISOR