

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

B913752623

FACILITY: Lambda Energy Resources LLC - Bear Lake 32		SRN / ID: B9137
LOCATION: 7614 Adamson Lake Rd., BEAR LAKE		DISTRICT: Cadillac
CITY: BEAR LAKE		COUNTY: MANISTEE
CONTACT: Vicki Kniss ,		ACTIVITY DATE: 02/26/2020
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2020 FCE		
RESOLVED COMPLAINTS:		

B9137 Lambda Energy Bear Lake 32

I conducted a Full Compliance Evaluation of the Lambda Energy Bear Lake 32 CPF including an on-site inspection and records review. The facility is permitted under Permit to Install No. 51-04A. At the time of the inspection the weather was mostly cloudy, 25 degrees F, 10 mph Northwest winds. Operators were working on the nearby pumpjack when I arrived at the site. At the CPF, one of the heaters was exhibiting visible emissions in the range of 25-35% (photo). Shortly after I arrived, the operators entered the separator building at the CPF. Visible emissions from the heater ceased soon after.

COMPLIANCE EVALUATION

1. EUBL32DEHY - Glycol dehydration system processing gas from the Niagaran formation.

1.1 and 1.2. Lambda Energy is not allowed to operate the facility unless a flash tank and condenser are installed and operating in a satisfactory manner. The dehy was not operating at the time of the inspection and there were no signs that it had been operating recently. Records provided by Lambda Energy indicated the dehydrator was out of service.

2. FGBL32COMPS – Two natural gas fired compressor engines used to boost the pressure of the natural gas prior to entering the sales line. At the time of the inspection, there were two Waukesha V-12 engine identified as units 206 and 146 on-site. Both engines were equipped with a catalyst. Neither unit was operating and both had tags indicating they had been drained of fluids. The operating log for Unit 146 indicates that it had last operated in 8/16 and the log for unit 206 indicated it has last operated in 9/16. There was one small electric motor driven compressor that was operating on a skid located outside the compressor building and covered by a temporary shelter.

2.1. A Malfunction Abatement and Preventative Maintenance Plan has been submitted to the AQD. This plan was approved on March 19, 2007 and most recently revised on 1/04/10.

2.2. The permit requires that FG-BL32COMPS not operate unless each 3-way catalyst is installed, maintained, and operated in a satisfactory manner. At the time of the inspection the catalytic converters were installed on both engines but neither engine is in use at this time.

2.3 and 2.4. Monitoring of natural gas usage is required. The compressor engine was equipped with a flow meter to monitor the natural gas usage, but the engines are not operating. The natural gas usage is recorded monthly and was provided by Lambda Energy. According to the records provided the 12-mos rolling avg., attributed to the heaters, averaged around 1.6 MMcf.

2.5. The permit requires a log of all significant maintenance activities. Lambda Energy provided AQD staff with records of all maintenance activities performed at the CPF which consisted of one day of service on the compressor.

3. FGBL32TANKS

3.1 the permit requires that FGBL32TANKS not be operated unless the vapor recovery unit is installed and operating properly. At the time of the inspection a vapor recovery unit was connected to the 5 storage tanks and was operating.

4. FG FACILITY – All process equipment at the facility including equipment covered by other permits, grandfathered equipment and exempt equipment.

4.1a. The nitrogen oxide (NOx) emissions from the facility are limited to 89 tons per 12-month rolling time period. Records submitted by the company (attached) indicate that the only NOx source is the heaters and that the monthly and 12-month rolling time period NOx emissions were around 0.08 tons per 12-mos rolling time period.

4.1b. The carbon monoxide (CO) emissions from the facility are limited to 89 tons per 12-month rolling time period. Records submitted by the company (attached) indicate that the only CO source is the heaters and that monthly and 12-month rolling time period CO emissions were around 0.07 tons per 12-mos. rolling time period.

4.2. The facility is allowed to burn only sweet natural gas. Past gas analysis provided by Lambda Energy have indicated that the gas burned in the facility is sweet.

4.3. Lambda Energy is limited to burning 100,000,000 standard cubic feet of natural gas in FGFACILITY per 12-month rolling time period. As indicated in 2.3 and 2.4, records provided by Lambda Energy indicate fuel usage is in the range of 1.6 MMSCF per 12-month rolling time period.

4.4, 4.5, and 4.6. The permit requires that monthly NOx and CO emission calculations be completed and available in a format acceptable to the AQD. The records were complete and provided as requested by AQD.

4.7. The permit requires that Lambda Energy maintain records of the monthly and 12-month rolling time period natural gas usage. As indicated above the records are maintained and were provided upon request.

OTHER EQUIPMENT

There are 10 various heaters on site and 3 were operating at the time of the inspection. Visible emissions from one of the heaters appeared to be a temporary process problem possibly associated with work that was taking place on the facility at the time of the inspection. The heaters are exempt per R 282(b) but fuel use in the heaters is accounted for in FGFACILITY.

CONCLUSION

Based upon the on-site inspection and records review, AQD staff believe that the facility is in compliance with applicable state and federal regulations as well as Permit to Install No. 51-04A.

NAME 

DATE 3-2-20

SUPERVISOR 