

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

B913949873

FACILITY: Lambda Energy Resources LLC - Blair 36		SRN / ID: B9139
LOCATION: 550 Clous Road, KINGSLEY		DISTRICT: Cadillac
CITY: KINGSLEY		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 08/01/2019
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2019 FCE PTI 632-96B		
RESOLVED COMPLAINTS:		

I conducted an Inspection of the Lambda Energy Blair 36 opt out source to determine compliance with Permit to Install number 632-96B and the air pollution control rules. This source is located on Clous Rd. and the driveway gate was closed and locked. At the time of the inspection the weather was clear, 65⁰ with light winds from the south. No visible emissions or odors were present. The equipment on-site included:

- Five 400 bbl AST's with vapor recovery tanks and one blow down tank
- One V-12 compressor engine (not in operation)
- One electric motor driven compressor
- One glycol dehydrator
- Four natural gas fired heaters

Though the tanks were equipped with vapor recovery, it did not appear to be operating at the time of the inspection. The vent stack on the blown down tank has been damaged and is bent. It appears that it could discharge material outside the containment area if there were a release from the tank. I provided this information to OGMD staff for follow-up.

Records regarding this facility were requested prior to the inspection (see attached) and indicate that NOx emissions are well within the PTI limit of 89 TPY. Very low emissions of CO, VOCs, SO2 and PM10 were also reported. This can primarily be attributed to the operation of the electric motor driven compressor instead of the gas fired compressor engine. Maintenance records are maintained and indicate regular maintenance of the compressor, dehy, VRU, tanks, and heaters. A copy of the gas analysis was provided that demonstrates the gas was non-detect for H2S.

Following are the findings of this inspection by permit Special Condition:

Glycol Dehydrator - This EU is equipped with a flash tank and condenser.

- 1.1 This EU is required to be in compliance with all provisions of 40 CFR 60 Subpart HH. This source appears to be exempt from HH based on gas throughput less than 85,000 cubic meters per day.
- 1.2 This EU is required to have a flash tank installed on it. A condenser and flash tank are in place.
- 1.3 A wet gas analysis of the gas coming into the EU is required once per year. This analysis, dated 5/11/2018, is attached to this report.
- 1.4 Natural gas flow to the EU is required to be measured and reported to demonstrate it meets the exemption criteria pursuant to 40 CFR 63.764(e)(1)(i) (must be less than 85,000 cu. meters/day based on an annual average). Records indicate this is being performed and a sample of this record is attached. The records provided indicate the daily average was approximately 509 cubic meters per day.
- 1.5 If the facility chooses to meet the exemption criteria pursuant to 40 CFR 63.764(e)(1)(ii), benzene emissions must be recorded. The facility has chosen to meet the exemption criteria pursuant to 63.764(e)(1)(i), therefore, this condition does not apply. (See item 1.8)
- 1.6 The facility is required to perform emissions calculations for this EU monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

1.7 Records of the wet gas analysis of the gas coming into the EU are required to be kept. This analysis is maintained and has been provided.

1.8 If the EU meets the exemption criteria pursuant to 40 CFR 63.764(e)(1)(i) for glycol dehydrators, records of natural gas throughput are required. The EU meets the exemption and these records are attached to this report.

1.9 If the EU meets the exemption criteria in 40 CFR 63.764(e)(1)(i) for glycol dehydrators, records of VOC emissions are required. These records are being kept.

1.10 The facility is required to submit notifications and reports for this EU pursuant to the MACT. MACT notification for this EU was received on 1/27/11. No other reporting is required.

1.11 Stack parameters for this EU do not appear to have changed and appear correct.

Compressor - The compressor is a Waukesha model, V-12 with no add on control device. This engine was not in operation at the time of the inspection.

2.1 NOx emissions from this EU are limited to 86.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate that this engine has not operated in the last 12 months and therefore had zero emissions.

2.2 The natural gas usage for this EU is limited to 22 million cubic feet per 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate that this engine has not operated in the last 12 months and therefore had zero natural gas usage.

2.3 A PMMAP for this EU is required and was submitted on 12/11/2007 and is on file.

2.4 The facility is not allowed to bypass any control device for this EU for more than 200 hours per year. The compressor does not have an add-on control device. Therefore, this condition does not apply.

2.5 The facility must maintain a control device for this EU if used. The compressor does not have an add-on control device. Therefore, this condition does not apply.

2.6 If requested by the AQD, the facility must perform stack testing on this EU to verify emission rates. As of the date of this inspection, stack testing has not been requested for this facility. Given the engine is not in use a request for testing is not anticipated.

2.7 The facility is required to maintain a device to measure natural gas usage for this EU. This device was in place.

2.8 The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

2.9 A maintenance log for this EU is required to be kept and is attached to this report.

2.10 The facility is required to keep records of any bypass of any control device. The compressor does not have an add-on control device. Therefore, this condition does not apply.

2.11 Natural gas usage records for this EU are required to be kept. A sample of these records is attached to this report.

2.12 NOx emissions records for this EU are required to be kept. These are being performed monthly in a satisfactory manner.

2.13 Stack parameters for this unit do not appear to have changed and appear correct.

2.14 A natural gas monitoring device is to be installed within 60 days of permit issuance. This condition is historic and has been performed by the facility.

2.15 The stack height is to apply within 60 days of permit issuance. This condition is historic and has been performed by the facility.

Facility Wide

3.1 NOx emissions from the facility are limited to 89.9 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate that as of 8/2018, NOx emissions were 0.11 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.

3.2 The facility is required to only burn sweet natural gas. An attached analysis of the gas indicates it is sweet per department definition.

3.3 The facility may be required to verify H2S and sulfur content of the gas. The analysis provided documented that the natural gas is non-detect for H2S

3.4, 3.5 The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

As a result of this inspection it appears the source is in compliance with PTI 632-96B and the Air Pollution Control Rules.

NAME 

DATE 8-12-19

SUPERVISOR SN