

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

N583167741

<b>FACILITY:</b> RIVERSIDE - WILDERNESS CO2 PLANT & HAYES 29 CPF		<b>SRN / ID:</b> N5831
<b>LOCATION:</b> 10875 Geronimo Trail, GAYLORD		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> GAYLORD		<b>COUNTY:</b> OTSEGO
<b>CONTACT:</b> Carolann Knapp , Compliance Coordinator		<b>ACTIVITY DATE:</b> 11/22/2022
<b>STAFF:</b> Jodi Lindgren	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> On-site inspection and record review as part of the FY23 Full Compliance Evaluation		
<b>RESOLVED COMPLAINTS:</b>		

### FACILITY DESCRIPTION

On Tuesday November 22, 2022, Jodi Lindgren of the Department of Environmental, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted an unannounced field inspection of Riverside Energy Michigan, LLC (Riverside) – Wilderness CO2 Plant and Hayes 29 CPF located at 10875 Geronimo Trail, Gaylord, Otsego County, Michigan, 49735. The entrance to facility is on the east side of Geronimo Trail approximately two mile south of the intersection of Mancelona Road and Geronimo Trail. The operation manager of the Wilderness CO2 Plant and Hayes 29 CPF was present at the facility during the inspection. Ms. Carolann Knapp of Riverside Energy provided AQD staff with the Wilderness CO2 Hayes 29 CPF compliance records.

The Wilderness CO2 Plant and the Hayes 29 CPF have been determined to be a single stationary source as such they are covered by single sectioned ROP, MI-ROP-N5831-2014a. Wilderness CO2 Plant is covered by section 1 of the ROP and Hayes 29 CPF is covered by section 2. The Hayes 29 CPF receives natural gas from the production wells in various shale formations. The Hayes 29 CPF utilizes a glycol dehydrator, process separators, process heaters, a natural gas compressor, and a compressor engine to remove water, brine, and oil condensate from the natural gas stream. The gas is then sent to the Wilderness CO2 plant for CO2 removal. The Wilderness CO2 Plant receives natural gas from several production facilities including the Hayes 29 CPF. The CO2 removal process actively uses four permitted reciprocating internal combustion engines (RICE) and a Rule 201 exempt RICE that was installed on May 29, 2021 for emergency use. The ROP includes two additional RICE that have been permanently decommissioned. Operation of EUENGINE5 ceased in 2015 and EUENGINE6 was officially decommissioned in December 2020 after being out of operation for several months due to mechanical issues. The Wilderness CO2 Plant also utilizes process separators, process heaters, and storage tanks as part of the CO2 removal process. Upon leaving the Wilderness CO2 Plant, the natural gas goes directly into a metered sale line.

The facilities were planning to become separate stationary sources. Breitburn was intending to apply for a Title V opt-out permit for the Wilderness CO2 Plant and Riverside obtained a new SRN (P1194) and minor source PTI (22-21) for the Hayes 29 CPF. However, on September 1, 2021, ownership of the facilities will change. Both facilities will be owned by Riverside, a single entity, and therefore a single stationary source. Breitburn decided not to apply for a Title V opt-out permit once the ownership change was announced. As such, the Wilderness CO2 Plant is still covered by Section 1 of MI-ROP-N5831-2014a. The new minor source permit obtained by Riverside, PTI 22-21, was issued on July 9, 2021 and only includes conditions for the glycol dehydrator that is also covered by EUGLYCOLDEHYDRATOR conditions in Section 2 of MI-ROP-N5831-2014a. Compliance with the conditions of PTI 22-21 will not be assessed separately as demonstrating compliance with the EUGLYCOLDEHYDRATOR conditions in Section 2 of MI-ROP-

N5831-2014a will satisfy the PTI requirements. The record review completed as part of this inspection covered the timeframe of October 1, 2021 to September 30, 2022.

### **COMPLIANCE EVALUATION**

**A. SOURCEWIDE** – The source-wide terms and conditions apply to both the Wilderness CO2 Plant and Hayes 29 CPF as a singular stationary source.

1. **Emission Limits** – The ROP establishes a NOx limit of 224 tons per year (tpy), a CO limit of 224 tpy, an individual HAP limit of less than 10 tpy, and an aggregate HAP limit of less than 25 tpy calculated at the end of each month using a 12-month rolling time period. Records provided by Riverside indicated the source-wide emission totals were 72 tpy of NOx emissions, 31 tpy CO emissions, 7.1 tpy of total aggregate HAP emissions, and 6 tpy of formaldehyde emissions for a 12-month rolling time period of October 2021 to September 2022. Formaldehyde is reported as the individual HAP with the greatest source-wide emission total. These records indicate compliance with the emission limits established in the ROP.

2. **Material Limits** – There are no source-wide material limits; therefore, this section is not applicable.

3. **Process/Operational Restrictions** – Only sweet natural gas is permitted to be used in natural gas fired equipment. Both facilities only use sweet natural gas and both facilities have recent gas analyses.

4. **Design/Equipment Parameters** – There are no source-wide design or equipment parameters; therefore, this section is not applicable.

5. **Testing/Sampling** – There are no source-wide testing and sampling requirements; therefore, this section is not applicable.

6. **Monitoring/Recordkeeping** – the ROP establishes recordkeeping for all source-wide emissions calculations. Riverside maintained and provided these records upon request.

7. **Reporting** – All reports submitted pursuant to the ROP were previously reviewed and documented with no noncompliance issues.

8. **Stack/Vent Restrictions** – There are no source-wide stack or vent restrictions; therefore, this section is not applicable.

9. **Other Requirements** – There are no additional source-wide requirements; therefore, this section is not applicable.

### **SECTION 1 WILDERNESS CO2 PLANT**

**B. FGCATENGINES** – Six natural gas fired Caterpillar reciprocating engines designated as EUENGINE1, EUENGINE2, EUENGINE3, and EUENGINE4. EUENGINE2, EUENGINE3, and EUENGINE4 are equipped with oxidation catalysts. EUENGINE1 does not have add-on pollution control.

EUENGINE1 is a 1085 hp CAT G3516 lean burn engine with a serial number of 3RC00254, a rebuild date of May 10, 2018, and a unit number of 831. At the time of the inspection, the engine was

running with an RPM of 1158, engine oil temperature of 210°F, engine oil pressure of 61 psi, coolant system temperature of 181°F, a compressor oil temperature of 200°F, a compressor oil pressure of 54 psi, and 36,797.4 hours of operation. This was consistent with the records kept on site which indicated that earlier on the same day, November 22, 2022, EUENGINE1 was running with an RPM of 1157, engine oil temperature of 210°F, engine oil pressure of 61 psi, coolant system temperature of 183°F, a compressor oil temperature of 197°F, and a compressor oil pressure of 54 psi.

EUENGINE2 is a 1085 hp CAT G3516 lean burn engine with a serial number of 4EK01389, a rebuild date September 11, 2012, and a unit number of 856. At the time of the inspection, the engine was not operating due to a crack in the foundation.

EUENGINE3 is a 1085 hp CAT G3516 EIS lean burn engine with a serial number of 4EK00340, a manufacture date of June 2006, and a unit number of 885. At the time of the inspection, the engine was running with an RPM of 1155, engine oil temperature of 183°F, engine oil pressure of 54 psi, coolant system temperature of 172°F, a compressor oil temperature of 162°F, a compressor oil pressure of 56 psi, and 11,862.0 hours of operation. This was consistent with the records kept on site which indicated that earlier on the same day, November 22, 2022, EUENGINE3 was running with an RPM of 1153, engine oil temperature of 190°F, engine oil pressure of 54 psi, coolant system temperature of 180°F, a compressor oil temperature of 170°F, and a compressor oil pressure of 56 psi.

EUENGINE4 is a 1150 hp CAT G3516 lean burn engine and a unit number of 907. An engine nameplate could not be located to verify the serial number or the manufacture/rebuild date. Previous facility records indicated the serial number to be 4EK00222. At the time of the inspection, the engine was running with an RPM of 1148, engine oil temperature of 202°F, engine oil pressure of 61 psi, coolant system temperature of 192°F, a compressor oil temperature of 184°F, a compressor oil pressure of 62 psi, and 73,878.6 hours of operation. This was consistent with the records kept on site which indicated that earlier on the same day, November 22, 2022, EUENGINE4 was running with an RPM of 1148, engine oil temperature of 200°F, engine oil pressure of 61 psi, coolant system temperature of 181°F, a compressor oil temperature of 180°F, a compressor oil pressure of 62 psi.

1. Emission Limits – The emission limits established by the ROP for each emission unit of FGCATENGINES are listed in the table below along with the reported emission totals for a 12-month rolling time period of October 2021 to September 2022. The records indicate compliance with the emission limits established in the ROP.

Emission Unit	ROP Emission Limits		Reported Emissions	
	Nox (tpy)	CO (tpy)	Nox (tpy)	CO (tpy)
EUENGINE1	23.1	20.8	18.3	16.5
EUENGINE2	23.1	4.5	0	0

<b>EUENGINE3</b>	<b>23.1</b>	<b>4.5</b>	<b>17.9</b>	<b>3.2</b>
<b>EUENGINE4</b>	<b>24.4</b>	<b>4.2</b>	<b>13.7</b>	<b>3.3</b>

**2. Material Limits - There are no material limits associated with this flexible group; therefore, this section is not applicable.**

**3. Process/Operational Restrictions –**

**(1) The ROP prohibits the operation of any engine equipped with an add-on control device for more than 200 hours per year without that control device consistent with the AQD approved PM/MAP. The records provided by Riverside indicate that the control equipment on EUENGINE3 was run 100% time and EUENGINE4 was operated a total of 1-hour without the add-on catalytic control during the time period of October 2021 to September 2022. EUENGINE1 is not equipped with an add-on control and EUENGINE2 was not operated.**

**(2) The ROP requires a preventative maintenance/malfunction abatement plan (PM/MAP). An updated PM/MAP was submitted on November 19, 2021 and review by AQD on November 24, 2021. The PM/MAP meets the requirements outlined in the ROP.**

**(3) The ROP requires any add-on control device to be installed, maintained, and operated according to manufacturer recommendations and PM/MAP procedures. Riverside provided monitoring data, maintenance logs, and emission testing reports for the catalytic control devices on EUENGINE3 and EUENGINE4. During the inspection time period of October 2021 to September 2022, both the EUENGINE3 control device and the EUENGINE4 control device had two emission tests completed and had an annual inspection and cleaning. The EUENGINE3 control device was functioning 100% of the time during engine operation. The EUENGINE4 control device was not functional for two separate 30-minute periods during head gasket changes.**

**(4) The ROP requires the use of a differential pressure gauge or manometer to monitor the oxidation catalyst for proper operation. A third-party contractor was utilized to assess and record temperature differentials, pressure differentials, and operational engine data monthly as well as conduct semi-annual emission tests to verify proper operation of the catalytic control device. The records were provided to AQD to demonstrate compliance.**

**(5) The ROP requires the use of a temperature gauge or thermocouple to monitor the oxidation catalyst for proper operation. A third-party contractor was utilized to assess and record temperature differentials, pressure differentials, and operational engine data monthly as well as conduct semi-annual emission tests to verify proper operation of the catalytic control device. The records were provided to AQD to demonstrate compliance.**

**4. Design/Equipment Parameters – The ROP requires the installation and calibration of thermocouple gauge in accordance to the manufacturer’s recommendations. A thermocouple gauge was installed and a third-party contractor was utilized to calibrate and record resulting data. The records were provided to AQD to demonstrate compliance.**

**5. Testing/Sampling – The ROP requires each engine in FGATENGINES to undergo emission test every five years to verify compliance with NOx and CO emission limits. The testing must be completed in accordance with AQD requirements. No testing was completed during the inspection time period of October 2021 to September 2022. The most recent emission tests for were completed in May 2020 with oversight from AQD field staff and review from AQD Technical Programs Unit. EUENGINE1 and EUENGINE2 testing were completed on May 21, 2020. EUENGINE3 and EUENGINE4 testing were completed on May 20, 2020. The results verified compliance with the emission limits established in the ROP. The next emission tests will need to be by May 2025.**

**6. Monitoring/Recordkeeping – Riverside demonstrated compliance with the monitoring and recordkeeping requirements of the ROP to document natural gas usage, add-on control device operational data including downtime, NOx and CO emission calculations, any engine replacement information, and maintain a log of all maintenance activities required by the PM/MAP for FGATENGINES. Riverside provided AQD staff the required documentation upon request. No engines were replaced during the inspection time period of October 2021 to September 2022. The most recent engine replacement occurred in July 2021 when EUENGINE3 was replaced with an equivalent emitting engine. The owner at that time provided AQD with the necessary notice and engine information.**

**7. Reporting – All reports submitted pursuant to the ROP were previously reviewed and documented with no noncompliance issues.**

**8. Stack/Vent Restrictions – The stacks associated with this flexible group appeared to be installed in accordance with the specifications contained in the ROP.**

**9. Other Requirements – There are no additional requirements for FGATENGINES; therefore, this section is not applicable.**

**C. FGWAUKENGINES – Two natural gas fired Waukesha rich burn reciprocating engines designated as EUENGINE5 and EUENGINE6. Operation of EUENGINE5 ceased in 2015 and EUENGINE6 was officially decommissioned in December 2020 after being out of operation for several months due to mechanical issues. EUENGINE5 has been removed from the facility. EUENGINE6 has been rendered inoperable as it is completely disconnected from other process equipment awaiting removal from the facility.**

**1. Emission Limits – EUENGINE5 and EUENGINE6 each have an independent NOx limit of 24.6 tpy and CO limit of 41.1 tpy to be calculated at the end of each month using a 12-month rolling time period. Neither engine operated during the inspection timeframe, so there are no emissions to report.**

**2. Material Limits – There are no material limits associated with this flexible group; therefore, this section is not applicable.**

**3. Process/Operational Restrictions – The process and operational restrictions could not be evaluated as the emission units were permanently decommissioned prior to the inspection timeframe.**

**4. Design/Equipment Parameters – The design and equipment parameters could not be evaluated as the emission units were permanently decommissioned prior to the inspection timeframe.**

**5. Testing/Sampling – The testing and sampling requirements could not be evaluated as the emission units were permanently decommissioned prior to the inspection timeframe.**

**6. Monitoring/Recordkeeping – The monitoring and recordkeeping requirements could not be evaluated as the emission units were permanently decommissioned prior to the inspection timeframe.**

**7. Reporting – The reporting requirements could not be evaluated as the emission units were permanently decommissioned prior to the inspection timeframe.**

**8. Stack/Vent Restrictions – The stacks associated with the emission units were not evaluated as the engines were permanently decommissioned prior to the inspection timeframe**

**9. Other Requirements – The applicable requirements of 40 CFR Part 64 – Compliance Assurance Monitoring could not be evaluated as the emission units were permanently decommissioned prior to the inspection timeframe.**

**D. FGRURALSIRICEMACT – Existing non-emergency Spark Ignition (SI) 4 Stroke Lean Burn (4SLB) and existing non-emergency SI 4 Stroke Rich Burn (4SRB) stationary RICE with site ratings greater than 500 HP located at an area source of HAPs, that meet the definition of remote stationary RICE in 40 CFR 63.6675. The emission units in this flexible group are EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4, EUENGINE5, and EUENGINE6. EUENGINE2 will not be assessed for compliance as it did not operate during the inspection timeframe due to a crack in the foundation of the compressor building. EUENGINE5 and EUENGINE6 will not be assessed for compliance as EUENGINE5 was decommissioned in 2015 and EUENGINE6 was decommissioned in 2020.**

**1. Emission Limits – There are no emission limits associated with this flexible group; therefore, this section is not applicable.**

**2. Material Limits – There are no material limits associated with this flexible group; therefore, this section is not applicable.**

**3. Process/Operational Restrictions – The ROP outlines the operational and maintenance requirements established in the RICE MACT including a schedule to change the engine oil and oil filter, inspect the spark plugs, and inspect all hoses and belts every 2160 hours of operation. If the facility complies with the maintenance schedule adopted with the AQD approved PM/MAP, the requirements of the RICE MACT conditions established in this ROP should be met. The maintenance records provided by Riverside states a third-party contractor performed all the necessary maintenance and inspection of EUENGINE1 on October 6, 2021, December 30, 2021, March 26, 2022, June 20, 2022, and September 13, 2022. The provided records also state the third-party contractor performed necessary maintenance and inspection of EUENGINE3 on October 8, 2021, January 4, 2022, March 30, 2022, June 24, 2022, and September 19, 2022. The third-party contractor performed necessary maintenance and inspection of EUENGINE4 on November 1, 2021, December 21, 2021, March 17, 2022, June 20, 2022, and September 6, 2022. Additional maintenance was conducted on EUENGINE1, EUENGINE3, and EUENGINE4 as needed**

which was determined by their monitoring program. The records provided by Riverside indicate compliance with these requirements.

4. Design/Equipment Parameters – The procedures and schedules established in the AQD approved PM/MAP appear to meet the manufacturer’s instructions and establish maintenance and operation protocols that are consistent with good air-pollution control practices.

5. Testing/Sampling – The oil analysis program was not used in lieu of changing the engine oil and filter every 2160 hours of operation; therefore, this section is not applicable.

6. Monitoring/Recordkeeping – Riverside reported that the subject emission units continue to meet the definition of remote stationary source as defined in 40 CFR 63.6675. All inspection, maintenance, monitoring, and service records were recorded and provided to AQD upon request.

7. Reporting – The semi-annual and annual reports submitted pursuant to the ROP were previously reviewed and documented with no noncompliance issues.

8. Stack/Vent Restrictions – There are no stack or vent restrictions associated with this flexible group; therefore, this section is not applicable.

9. Other Requirements – Compliance with the applicable requirements of 40 CFR Part 63, Subpart A and Subpart ZZZZ appear met per the records provided to AQD.

#### **SECTION 2 HAYES 29 CPF**

E. EUGLYCOLDEHYDRATOR – One triethylene glycol dehydrator to process field gas from both the Antrim and Niagaran formations. The glycol reboiler equipped with a 4015-4020PV Kimray glycol pump with a maximum output of 40 gals/hr. The system has been reported to have a maximum natural gas flow rate of 2 MMSCF/day, a glycol recirculation rate is 0.1 gal/min, and a Btu rating of 125,000 btu/hr. Assessment of PTI 22-21 compliance will accomplished concurrently with the compliance assessment of EUGLYCOLDEHYDRATOR conditions.

1. Emission Limits – There are no emission limits associated with this emission unit; therefore, this section is not applicable.

2. Material Limits – There are no material limits associated with this emission unit; therefore, this section is not applicable.

3. Process/Operational Restrictions – There are no process or operational restrictions associated with this emission unit; therefore, this section is not applicable.

4. Design/Equipment Parameters – There are no design or equipment parameters associated with this emission unit; therefore, this section is not applicable.

5. Testing/Sampling – There are no testing or sampling requirements associated with this emission unit; therefore, this section is not applicable.

6. Monitoring/Recordkeeping – Riverside provided documentation that the dehy has an actual average natural flow rate of 1.83 MMSCF/day which is less than the NESHAP HH exemption flow rate of less than 85,000 cubic meters per day or 3 MMCF/day. Riverside also provided laboratory analysis of the gas stream taken on April 5, 2022. The laboratory analysis reported non-detect

hydrogen sulfide and no benzene. A GRI-GIYCalc report was also provided that utilized the April 5, 2022 gas analysis. The results indicated the dehy met the NESHAP HH exemption for having actual average benzene emissions below 0.9 megagrams per year.

7. Reporting – All reporting submitted pursuant to conditions of the ROP were previously reviewed and documented by AQD staff.

8. Stack/Vent Restrictions – There are no stack or vent restrictions associated with this flexible group; therefore, this section is not applicable.

9. Other Requirements – Based upon the records provided by Riverside, the facility appears to be in compliance with the applicable requirements of NESHAP HH.

F. EUENGINEH29 – One remote 1085 hp CAT G3516 TALE (lean burn) engine equipped with an oxidation catalytic converter and air/fuel ratio controller. The engine serial number is 3RC00303 and the skid unit number is 3956. At the time of the inspection, the engine was running with an RPM of 1028, engine oil temperature of 192°F, engine oil pressure of 53 psi, coolant system temperature of 203°F, a compressor oil temperature of 189°F, a compressor oil pressure of 67 psi, and 44,727 hours of operation. This was consistent with the records kept on site which indicated that earlier on the same day, November 22, 2022, EUENGINEH29 was running with an RPM of 1032, engine oil temperature of 192°F, engine oil pressure of 53 psi, coolant system temperature of 192°F, a compressor oil temperature of 189°F, and a compressor oil pressure of 66 psi.

1. Emission Limits – For EUENGINEH29, the ROP established a NO<sub>x</sub> limit of 24.6 tons per year (tpy) and a CO limit of 41.1 tpy calculated at the end of each month using a 12-month rolling time period. Records provided by Riverside indicate EUENGINEH29 emitted 15.5 tpy of NO<sub>x</sub> emissions and 2.8 tpy CO emissions calculated for a 12-month rolling time period of October 2021 to September 2022. These records indicate compliance with the emission limits established in the ROP.

2. Material Limits – There are no material limits associated with this emission unit; therefore, this section is not applicable.

3. Process/Operational Restrictions –

(1) The ROP prohibits the operation of any engine equipped with an add-on control device for more than 200 hours per year without that control device consistent with the AQD approved PM/MAP. The records provided by Riverside indicate that the control equipment on EUENGINEH29 was run 100% time during the time period of October 2021 to September 2022.

(2) The ROP requires a preventative maintenance/malfunction abatement plan (PM/MAP). An updated PM/MAP was submitted on November 19, 2021 and review by AQD on November 24, 2021. The PM/MAP meets the requirements outlined in the ROP.

(3) The ROP requires any add-on control device to be installed, maintained, and operated according to manufacturer recommendations and PM/MAP procedures. Riverside provided monitoring data, maintenance logs, and emission testing reports for the catalytic control device on EUENGINEH29. During the inspection time period of October 2021 to September 2022, the EUENGINEH29 control device had one emission test and five inspections with full maintenance



service by a third-party contractor. The EUENGINEH29 control device was functioning 100% of the time during engine operation.

(4) The ROP requires the use of a differential pressure gauge or manometer to monitor the oxidation catalyst for proper operation. A third-party contractor was utilized to assess and record temperature differentials, pressure differentials, and operational engine data monthly as well as conduct annual emission tests to verify proper operation of the catalytic control device. The records were provided to AQD to demonstrate compliance.

(5) The ROP requires the use of a temperature gauge or thermocouple to monitor the oxidation catalyst for proper operation. A third-party contractor was utilized to assess and record temperature differentials, pressure differentials, and operational engine data monthly as well as conduct semi-annual emission tests to verify proper operation of the catalytic control device. The records were provided to AQD to demonstrate compliance.

4. Design/Equipment Parameters – The ROP requires the installation and calibration of thermocouple gauge in accordance to the manufacturer’s recommendations. A thermocouple gauge was installed and a third-party contractor was utilized to calibrate and record resulting data. The records were provided to AQD to demonstrate compliance.

5. Testing/Sampling – The ROP requires EUENGINEH29 to undergo emission test every five years to verify compliance with NOx and CO emission limits. The testing must be completed in accordance with AQD requirements. No testing was completed during the inspection time period of October 2021 to September 2022. The most recent emission tests for were completed May 19, 2020 with oversight from AQD field staff and review from AQD Technical Programs Unit. The results verified compliance with the emission limits established in the ROP. The next emission tests will need to be by May 2025.

6. Monitoring/Recordkeeping – Riverside demonstrated compliance with the monitoring and recordkeeping requirements of the ROP to document natural gas usage, add-on control device operational data including downtime, NOx and CO emission calculations, any engine replacement information, and maintain a log of all maintenance activities required by the PM/MAP for EUENGINEH29. Riverside provided AQD staff the required documentation upon request. EUENGINEH29 was not replaced during the inspection time period of October 2021 to September 2022. The most recent engine replacement occurred in September 2021 when EUENGINEH29 was replaced with an equivalent emitting engine. The owner at that time provided AQD with the necessary notice and engine information.

7. Reporting – All reports submitted pursuant to the ROP were previously reviewed and documented with no noncompliance issues.

8. Stack/Vent Restrictions – The stacks associated with this emission unit appeared to be installed in accordance with the specifications contained in the ROP.

9. Other Requirements – There are no additional requirements for EUENGINEH29; therefore, this section is not applicable.

**G. EUMACTZZZZ – Existing non-emergency Spark Ignition (SI) 4 Stroke Lean Burn (4SLB) stationary RICE with site ratings greater than 1089 HP located at an area source. EUENGINEH29 equipped with a oxidation catalytic control is the only emission unit covered by EUMACTZZZZ.**

**1. Emission Limits – There are no emission limits associated with this flexible group; therefore, this section is not applicable.**

**2. Material Limits – There are no material limits associated with this flexible group; therefore, this section is not applicable.**

**3. Process/Operational Restrictions – The ROP outlines the operational and maintenance requirements established in the RICE MACT including a schedule to change the engine oil and oil filter, inspect the spark plugs, and inspect all hoses and belts every 2160 hours of operation. If the facility complies with the maintenance schedule adopted with the AQD approved PM/MAP, the requirements of the RICE MACT conditions established in this ROP should be met. The maintenance records provided by Riverside states a third-party contractor performed all the necessary maintenance and inspection of EUENGINEH29 on October 18, 2021, January 11, 2022, April 5, 2022, June 29, 2022, and September 24, 2022. Additional maintenance was conducted on EUENGINEH29 as needed which was determined by their monitoring program. The records provided by Riverside indicate compliance with these requirements.**

**4. Design/Equipment Parameters – There are no design or equipment parameters associated with this emission unit; therefore, this section is not applicable.**

**5. Testing/Sampling – There are no testing or sampling requirements associated with this emission unit; therefore, this section is not applicable.**

**6. Monitoring/Recordkeeping – Riverside reported that EUENGINEH29 continues to meet the definition of remote stationary source as defined in 40 CFR 63.6675. All inspection, maintenance, monitoring, and service records were recorded and provided to AQD upon request.**

**7. Reporting – The semi-annual and annual reports submitted pursuant to the ROP were previously reviewed and documented with no noncompliance issues.**

**8. Stack/Vent Restrictions – The stacks associated with this emission unit appeared to be installed in accordance with the specifications contained in the ROP.**

**9. Other Requirements – Compliance, reevaluation, and recordkeeping with the applicable requirements of 40 CFR Part 63, Subpart A and Subpart ZZZZ appear met per the records provided to AQD.**

NAME 

DATE 11-14-23

SUPERVISOR 