

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

N593726136

FACILITY: Merit Energy Company - Forest 24 CPF		SRN / ID: N5937
LOCATION: Canada Creek Rd, CHEBOYGAN		DISTRICT: Cadillac
CITY: CHEBOYGAN		COUNTY: CHEBOYGAN
CONTACT:		ACTIVITY DATE: 07/24/2014
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 FCE site inspection and records review.		
RESOLVED COMPLAINTS:		

I conducted a compliance inspection and records review of the Merit Forest 24 CPF. The Forest 24 is an opt-out facility operating under PTI 650-96. At the time of the inspection the following equipment was present at the facility:

- A tank battery consisting of 4, 400 bbl tanks connected to a VRU that was operating at the time of the inspection. The contents of the tanks were not identified.
- There were 6 heaters, four of which appeared in operable condition but only one which was operating. There were no burner specification plates visible on any of the heaters to indicate their heat input capacities.
- There was one dehydrator which was operating at the time of the inspection with a glycol circulation rate of 18 strokes per minute on the pump. The dehy was equipped with a condenser, some mild odors were present.
- The compressor building contained one compressor/engine. PTI 650-96 indicates there is one Waukesha F2895G in-line 6 cylinder engine rated at 315 hp. The engine is not equipped with a catalytic converter. At the time of the inspection the engine, as described, was operating. The engine was operating at 589 rpm and engine oil pressure was 30 psi. These readings were consistent with the compressor log sheets which indicated that engine parameters had been observed and recorded each day.
- 10 wells are connected to the facility header. There was no NGL separation equipment, it does not appear this facility would be subject to Subpart KKK. Also this facility is not equipped with a flare.

Prior to the inspection I requested the required records from MEC and received them on 11/01/13 along with records for other MEC facilities to be inspected during the 2015 fiscal year.

The records provided by MEC address the requirements of each Special Condition in the PTI.

S.C.13: CO, VOC, NOx emission limits of 89 tpy (12-month rolling period) each. The records provided indicate CO emission averaged around 5tpy, VOC less than 1tpy, and NOx around 70 tpy. Emissions calculations are based on manufacturer emission factors for the engine. Separate emission calculations were not requested or provided for the heaters and glycol dehydrator.

S.C.14: HAP emissions records from the dehy were not requested or provided. ^{Dehy} Engine emission calculations for VOC are less than 1 tpy therefore HAP emissions from the engine would be less than 1 tpy which is well below the 9 tpy limit for individual HAPs and 22.5 tpy limit for total HAPs.

S.C.15: Monthly emissions are calculated using specific engine manufacturer emission factors as approved by AQD.

S.C.16: Monthly fuel usage is included in the Monthly Emission Summary spreadsheet.

S.C.17: Records of the amount of gas produced each month were not requested or reviewed.

S.C.18: The MAERS report was submitted and reviewed on 6/02/14.

S.C.19: Maintenance records are maintained and were provided (attached).

S.C.20: Tanks on site are less than 952 barrels but are equipped with a vapor recovery unit (VRU) which was operating at the time of the inspection.

S.C.21: There are no required control devices on the engine. The VRU records indicate the unit was not off for more than 48 hrs for any single event or 144 hrs total for the year.

S.C.22: The facility is not subject to Subpart KKK Onshore Natural Gas Processing Facilities.

S.C.23: Stack testing has not been required by AQD at this facility.

S.C.24: The facility only processes sweet natural gas.

Based on my review including the site inspection, records review and MAERS audit, the facility appears to be currently in compliance with PTI 650-96.

NAME  DATE 7-29-14 SUPERVISOR 