

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

N605436526

FACILITY: RIVERSIDE ENERGY MICHIGAN, LLC - ELMIRA 14		SRN / ID: N6054
LOCATION: SE/4 SE/4 SECTION 11, ELMIRA		DISTRICT: Cadillac
CITY: ELMIRA		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 09/09/2016
STAFF: Bill Rogers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection (non-FCE)		
RESOLVED COMPLAINTS:		

On September 9, 2016, I inspected the Riverside Energy Elmira 14 facility. I had thought this was a minor source, however it is in our database as an opt-out assigned to Rob Dickman.

I found one violation: Judging by eye, the stack of EUENGINE1 does not meet permit requirements for height. I will discuss with Rob whether I should send a Violation Notice for this.

**DISCUSSION:**

The facility was previously owned by Chevron. The name has been changed in our database. Latitude and longitude in our database are correct.

Natalie Schrader at Riverside Energy told me, in an email, that the facility contains two engines, Unit 823 and Unit 121. Unit 121 "has been shut in since 8/2014." This reflects what I found on site: One compressor engine with no catalytic oxidizer, operating, and one smaller engine with catalytic oxidizer, not operating.

Table EUDEHY, Special Condition VI.1b, allows Riverside Energy to show that the facility is exempt from the more stringent control requirements of NSPS HH, 40 CFR Part 63 Subpart HH, by demonstrating that actual annual average natural gas flow rate to the glycol dehydration unit is less than 85,000 standard cubic meters per day. Condition VI.2 requires keeping records of this information, if this means of proving exemption is used. Riverside has provided gas flow information, attached, demonstrating this. This complies with the permit conditions.

Table FGENGINES, Condition III.1, requires an approved Preventative Maintenance / Malfunction Abatement Plan. A copy of the plan and of AQD's approval letter is attached.

Condition III.2 prohibits operating any engine equipped with an add on control device for more than 200 hours per engine per year without that control device. Condition VI.4 requires keeping track of the hours operating without an add on control device. Unit 823, which is operating, has no add on control device. Unit 121 has an add on control device but is not operating. Therefore these conditions do not apply.

Condition IV.2 requires a gas consumption measuring device for each engine. Engine gas consumption data is attached, indicating such a device exists. The data was kept and supplied to us upon request in compliance with Condition VI.2.

Condition VI.3 requires a maintenance log. A sample page of the maintenance log is attached.

Condition VI.6 requires monthly and 12 month NOx emissions records. Condition VI.7 requires monthly and 12 month CO emissions records. These were not provided, in violation of permit requirements.

Condition VIII.1.1 is for SVENGINE1, which I assume is the stack for Unit 823. It requires a maximum exhaust diameter of 12 inches at a minimum height of 17 feet. The stack height of the 12 inch diameter stack appeared to me to be closer to 12 feet, perhaps 14. This is close enough that I cannot say, judging by eye, that it is in violation of the permit condition, but I believe it is.

Condition VIII.1.2 is for SVENGINE2, which I assume is the stack for Unit 121. It calls for a maximum exhaust diameter of 12 inches at a minimum height above ground of 12 feet. The stack diameter appears to be less than 12 inches, perhaps 8 inches; that is acceptable. It appears to be at an elevation of 12 feet above ground; that is also acceptable. However, the conditions also require that the exhaust should be

unobstructed vertically upward. The exhaust of the 8 inch diameter stack is horizontal. This would be a violation if this engine returned to service.

The facility includes two engines in two sheds. The larger engine, in the southern of the two sheds, is labeled NGCS 823 in metal characters welded to the engine mount. It has no catalytic oxidizer. It exhausts horizontally through the wall to a horizontal muffler, then through a pipe elbow to exhaust unobstructed vertically upward at an elevation of about 12 to 14 feet. It was operating. There was no opacity in its exhaust. I didn't notice any odors or unusual vibration in its operation.

In the northern shed was an engine labeled as NGCS 121. It was not operating. It had a horizontal exhaust through the shed wall to a horizontal muffler, then to a pipe elbow directing the exhaust away horizontally. It appeared to be about 8 inches diameter at an elevation of about 12 feet above ground level.

The facility includes one glycol dehydrator, which was operating. It had a B&W Equipment Company burner rated at 125,000 BTU according to its builder's plate (presumably BTU per hour). The reboiler stack was about 6 inches diameter, 18 feet high, unobstructed vertically upward. I didn't see the still vent, but I could smell a mild glycol odor in the area.

Small tanks on site included two 300 gallon size drum on stilt tanks, probably lubricating oil, in the south (Unit 823) shed. There was also a larger cylindrical tank labeled as waste oil. Near the dehy, outside the south shed were 300 gallon drum on stilt style tanks, one labeled methanol and one triethylene glycol, over wooden berm structures. I didn't see any tanks in the northern shed. I didn't see any brine tanks on site.

I didn't see any leaks or stained soils which might indicate leaks or spills. Maintenance appeared to be good.

NAME William J Rogers Jr

DATE 9/14/16

SUPERVISOR 