

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

N605444745

FACILITY: RIVERSIDE - ELMIRA 14 CPF		SRN / ID: N6054
LOCATION: SE/4 SE/4 SECTION 11, ELMIRA		DISTRICT: Gaylord
CITY: ELMIRA		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 06/08/2018
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	
SUBJECT: Scheduled inspection and records review		SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:		

On June 8, 2018, I inspected the Riverside Energy Elmira 14 facility. I didn't find any violations during this inspection.

The facility includes two natural gas fired compressor engines and a glycol dehydrator. I didn't see any large storage tanks.

The facility is covered by PI 282-09.

PI 282-09, table EUDEHY, requires compliance with 40 CFR 63 Subpart HH. AQD has not been delegated authority to enforce this Subpart. However, it is likely this facility is exempt from the more stringent control requirements for Subpart HH because benzene emissions are likely to be negligible. Facilities which emit less than one ton per year of benzene are exempt from the more stringent control requirements of Subpart HH.

Table FGENGINES, Conditions I.1 and 2, set emission limits for EUENGINE1 of 30 tons NOx and 25 tons CO per 12 month rolling time period. EUENGINE1 is the larger of the two engines on site, also known as Unit #823. Emissions calculations from Riverside, attached, claim 12.77 tons NOx and 11.49 tons CO per 12 month rolling time period. This complies with the permit conditions.

Conditions I.3 and 4, set emission limits for EUENGINE2 of 10 tons NOx and 2 tons CO per 12 month rolling time period. EUENGINE2 is the smaller of the two engines on site, also known as Unit #121. Emission calculations from Riverside, attached, claim 1.04 tons NOx and 0.60 tons CO per 12 month rolling time period. This complies with the permit conditions.

Condition III.1 requires a Malfunction Abatement Plan. AQD received a MAP for this facility. We approved it July 8, 2010.

Condition III.2 prohibits operating an engine with an add on control device for more than 200 hours per 12 month rolling time period. Condition VI.4 requires recording hours of operation without the add on control device. This information was not in the printed data Riverside provided us. I phoned Natalie Schrader at Riverside, who told me the information is on another tab of the spreadsheet. She looked it up. She told me that EUENGINE2 had been offline for a couple years. It has operated for several months after starting up again. In that time it has not run without the add on control device. I will accept this information as showing compliance with the permit conditions.

Condition IV.1 requires add on control devices to be installed and operating properly. EUENGINE2 has a catalytic oxidizer. It appeared to be installed and operating properly at the time of my inspection

Condition IV.2 requires fuel use meters for each engine. While I was on site a mechanic showed me electronics boxes on the engines which, he said, contained the electronics for the fuel meters. One had "engine fuel" written on it in pencil. It appears the facility is in compliance with this permit condition.

Condition VI.1 requires monitoring fuel use for each engine. Condition VI.5 requires recording fuel use. The engines have what are said to be fuel meters and fuel use information is in the attached records. It appears the facility is in compliance with these permit conditions.

Condition VI.3 requires a maintenance log. Riverside provided us with downtime reports which list maintenance performed. This complies with the permit condition.

Conditions VI.6 and 7 require calculating and recording monthly and 12 month NOx and CO emissions for each engine. This information is included in the attached records. This complies with the permit conditions.

Condition VIII.1 requires the stack for EUENGINE1 be a maximum diameter of 12 inches at a minimum height of 17 feet. Condition VIII.2 requires the stack for EUENGINE2 be a maximum diameter of 12 inches at a minimum height of 12 feet. The stacks appeared to satisfy these permit conditions.

#### COMMENTS

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.

The south shed includes one Caterpillar natural gas fired compressor engine with no catalytic oxidizer. It is labeled as GCS 823 in metal characters welded to the engine mount. It was running with no unusual noise, smoke, or smell. There was no opacity. Engine oil pressure was 75 PSI, Engine water temperature 200 f, compressor oil pressure 65.

The north shed includes one small Caterpillar natural gas fired compressor engine with catalytic oxidizer. It is labeled as NGCS 121 in metal characters welded to the engine mount. It was running at 1230 RPM. Engine oil temperature was 180 f, engine oil pressure 60 psi, compressor oil temperature 50. According to our remote infrared thermometer, temperature on the lower end of the catalytic oxidizer shell was 281 degrees f, on the upper 313 degrees f. Upper was the outlet end. A higher temperature at outlet hints that pollutants are burning up inside the catalytic oxidizer, which suggests that it is operating properly.

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. The north shed also included two 300 gallon drum on stilts tanks, one labeled as gas engine oil, one as industrial lubricating oil. There was a third 300 gallon size tank on the floor labeled as waste oil.

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 6/14/18 SUPERVISOR [Signature]