

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

N606069948

FACILITY: RIVERSIDE - SHERMAN 35		SRN / ID: N6060
LOCATION: SW/4, NW/4, SW/4, T20N, R9W, SEC 35, TUSTIN		DISTRICT: Gaylord
CITY: TUSTIN		COUNTY: OSCEOLA
CONTACT: Natalie Schrader , Environmental Specialist		ACTIVITY DATE: 11/22/2023
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Full inspection of this opt out source.		
RESOLVED COMPLAINTS:		

The Breitburn Operating Sherman 35 is a natural gas and natural gas liquid processing facility located in Osceola County. This facility processes natural gas from the PDC zone through drying using a glycol dehydrator and compression. There is also a refrigeration unit on site for condensing and collection of natural gas liquids. I inspected this facility with respect to Permit to Install number 612-96B. Following are the finding of this inspection.

Following is a list of pertinent equipment noted on site:

- One 30,000 gallon above ground storage tank (AST)
- Seven 400-barrel (bbl) ASTs with vapor recovery
- In shack hydrogen sulfide monitoring
- One refrigeration unit including a large glycol dehydrator.
- One Caterpillar V-16 399TA compressor engine with catalytic control
- Three in line heaters

One waste flare that did not appear to have a constant pilot and was not in operation.

EUDEHY - Glycol dehydration system processing gas from the PDC zone.

Emission Limits

NA

Material Limits

NA

Process or Operational Restrictions

NA

Design or Equipment Parameters

NA

Testing

NA

Monitoring/Recordkeeping

If EUDEHY actual annual average flow rate of natural gas is less than 85,000 cubic meters per day, the dehy is exempt from the criteria listed in 40 CFR 63, Subpart HH. Records provided by the facility indicate this dehy has an annual average flow of 22,313 cubic meters per day.

Reporting

The facility is to submit any required reporting per 40 CFR 63, Subpart HH. As the dehy is exempt, this reporting is not required.

Stack Restrictions

NA

Other

The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH, as they apply to EUDEHY. (40 CFR Part 63, Subpart HH). By complying with the provisions of this permit, the facility is in compliance with the subpart.

EUENGINE - Natural gas fired reciprocating engine.

Following is data taken on site regarding this engine:

- Unit Number 761
- Caterpillar 399TA with catalytic control
- Pre catalyst temp, 834 F; Post catalyst temp, 828 F
- Oil pressure, 54 psi
- Water jacket temp, 178 F
- RPM, 970

Emission Limits

Oxides of Nitrogen (NOx) emissions from EUENGINE1 are not to exceed 17 tpy based on 12-month rolling time period as determined at the end of each calendar month. The highest monthly 12-month rolling time period NOx emissions for the review period occurred in January through June of 2023 at 0.48 tons.

Carbon Monoxide (CO) emissions from EUENGINE1 are not to exceed 65 tpy based on 12-month rolling time period as determined at the end of each calendar month. The highest monthly 12-month rolling time period CO emissions for the review period occurred in June of 2023 at 2.15 tons.

Material Limits

NA

Process or Operational Restrictions

A Malfunction Abatement Plan (MAP) is required for this engine. The facility submitted an updated MAP on August 31, 2022, and it was approved on September 8, 2022.

The facility is not allowed to operate without a catalyst in place for more than 200 hours per year based on a 12-month rolling time period. Records of facility downtime were submitted. For the review period, the entire facility was down a total of 71 hours. A review of these records indicated no time when the catalyst was bypassed or not installed.

Design or Equipment Parameters

The catalyst is to be installed and operated in as satisfactory manner to include maintenance and operation per manufacturer's instructions. As noted above, no issues were noted with catalyst operation.

A flow meter is to be installed to monitor natural gas usage. This engine is so equipped.

Testing

Upon request, the facility is required to verify NOx and CO emissions from this engine. This has never been requested, and given the clean compliance history of the facility, there is no need to request it at this time.

Monitoring and Recordkeeping

Natural gas usage is to be monitored on a continuous basis. A fuel report was supplied. For the review period, the highest fuel consumption occurred in October of 2022 at 2520 Mcf.

All associated maintenance activities are to be recorded. Records of facility downtime and maintenance were submitted.

Any time the engine operated without the catalyst is to be recorded. As noted above, no issues were noted with catalyst operation.

NOx and CO emissions are to be kept on a 12-month rolling time period. Records provided by the facility indicate this is being performed.

Reporting

It is allowed that the engine be swapped out for an equal or lesser emitting engine. The facility must notify AQD within 30 days of the swap. No reporting of this nature has been received. On site inspection indicates the original permitted engine is on site.

Stack/Vent Restrictions

The engine stack must be at least 14 feet tall with a maximum exit diameter of 8 inches. This stack appears to meet these parameters and does not appear to have been modified recently.

Other

The engine is required to comply with all applicable conditions of 40 CFR 63, Subpart ZZZZ. By complying with the provisions of this permit, the engine is in compliance with the subpart.

FGFACILITY

Emission Limits

NA

Material Limits

Only sweet gas is allowed to be consumed at the facility. Sour gas is defined as any gas containing more than 1 grain of hydrogen sulfide or more than 10 grains of total sulfur per 100 standard cubic feet. Gas stream analysis completed in August of 2023 provided by the facility indicates hydrogen sulfide content of the gas stream was below detection.

Process and Operational Restrictions

NA

Design and Equipment Parameters

NA

Testing

Verification of H₂S and/or sulfur content of the natural gas burned may be requested. Gas stream analysis completed in August of 2023 provided by the facility indicates hydrogen sulfide content of the gas stream was below detection. Therefore, there is no need to request this analysis.

Monitoring and Recordkeeping

NA

Reporting

NA

Stack and Vent Restrictions

NA

Other

This facility must comply with the provisions, including recordkeeping and reporting, 40 CFR Part 60 Subparts A and KKK, as they apply. The facility reports semi-annually per this subpart on Leak Detection and Repair activities. This report demonstrates compliance with the subpart. This report has been previously reviewed and documented.

At the time of the inspection, this facility was in compliance with applicable air permitting and standards.

NAME DATE 1-31-24SUPERVISOR 