

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

N607664838

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| FACILITY: RIVERSIDE - MONITOR 11 CPF | | SRN / ID: N6076 |
| LOCATION: THREE MILE RD, BAY CITY | | DISTRICT: Bay City |
| CITY: BAY CITY | | COUNTY: BAY |
| CONTACT: Carolann Knapp | | ACTIVITY DATE: 09/27/2022 |
| STAFF: Benjamin Witkopp | COMPLIANCE STATUS: Compliance | SOURCE CLASS: <i>MINOR</i> |
| SUBJECT: facility inspection | | |
| RESOLVED COMPLAINTS: | | |

Riverside Energy purchased Michigan based assets previously owned by Breitburn. One of the assets was the Monitor 11 site located in Monitor Township just north of the intersection of Wilder Rd. and Three Mile Rd. in Bay County Michigan. Riverside successfully completed an air permit revision which resulted in the issuance of permit 682-96D. The revision eliminated Engine two as well as the natural gas liquids (NGL) operations. Riverside's Carolann Knapp was the company contact for the permit and ultimately provided access to the unmanned site via Steve Scholl who deals with pipeline operations. Carolann separately provided records required by the permit.

ENGINE 1

Engine 1, for production, unit 784, is a 399TA Cat rated at 930 hp. It has serial number 49C01195. Records showed it typically used 1,400 to 1,500 Mcf per month to power an Ariel JGR/4 compressor. At the time of the inspection, the exhaust (entering the catalyst) was 801f and exited at 907f. Records showed 900f to 940s on the catalyst inlet while exiting the catalyst ranged from 940f to 980+.

The last internal testing of the catalyst on May 2, 2022 showed 98.5% reduction of NOx and 93.3% for CO. Previous testing showed similar values for NOx but lesser so for CO. On May 2, 2022 the element was also cleaned and washed catalyst was installed. Records showed for the last 12 months a total of 0 hrs of engine operation were run without the use of a catalyst.

Engine 1 has 12 month rolling limits for NOx of 20 tpy and CO of 15 tpy. Records for engine 1 indicated 2.3 tons of NOx and 3.9 tons of CO per 12 month rolling time period. These values are well below the permit limit.

40 CFR PART 63 SUBPART ZZZZ

Engine 1 is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ - requirements for existing stationary reciprocating internal combustion engines (RICE) located at area sources of hazardous air pollutants (HAPs). The site is currently classified as an area source of HAPs after the most recent permitting activity. The engine is greater than 500 HP and is deemed an existing engine rather than a new engine.

Given the situation, the engine must meet the requirements found in Table 2D item 8 of the subpart. It applies to non-emergency, non-black start 4SLB remote stationary RICE greater than 500 HP. The requirements are to change the oil and filter, inspect spark plugs and replace as necessary, and inspect all hoses and belts and replace as necessary. The activities are to occur every 2,160 hours of operation or annually, whichever comes first.

The facility has a contract for engine maintenance and performance monitoring. The results of their activity are given to Riverside and input into a maintenance database. Riverside requires the service to be conducted within 2,160 hrs. It is designated as "service" on the facility compressor downtime report and did occur within the specified time frames. Actual service tickets from the contracted maintenance firm are available.

DEHY

The dehy has a limit on the temperature of the exhaust gas from the downcomer pipe (air cooled condenser). The limit is 120f. At the time the temperature was 62f compared to an inlet temperature of 230. The highest temperature recorded since the new permit allowed weekly checks was 90f during the third week of August 2022.

The dehy complies with two separate exemptions found in 40 CFR Part 63 subpart HH. It should be noted the company could choose to demonstrate compliance one way. The first exemption is for the actual annual average flow rate of gas being less than 85,000 cubic meters per day. Records for 2022 showed a daily average of 21,073 cubic meters per day. A second exemption is for the actual average benzene emissions to be less than 0.90 megagrams per year. That value equates to 0.992 tons. Records for 2022 showed 0.0110 tons. The benzene emissions are determined using an annual analysis of the wet gas stream in combination with the GRI-GLYCalc model.

CONCLUSION

The facility is considered to be in compliance.

NAME B. Zintkepp

DATE 7-29-2020 SUPERVISOR C. Hove