

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

N608465264

FACILITY: Lambda Energy Resources LLC - Kalkaska 11		SRN / ID: N6084
LOCATION: CTY RD 612, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT:		ACTIVITY DATE: 11/02/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2023 FCE.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation: N6084 Lambda Kalkaska 11, Kalkaska County

I conducted a Full Compliance Evaluation (FCE) of the Kalkaska 11 to determine compliance with Permit to Install number 638-96A and the Air Pollution Control Rules. I observed the site prior to entering the facility, no odors were detected downwind and no visible emissions were present. The weather was clear, 60 degrees F with light wind from the Southwest. At the time of the inspection the following equipment was observed on site:

- Five 400 bbl AST's with vapor recovery
- One Waukesha V-12 compressor engine with no control
- One glycol dehydrator (indoor)
 - Three heaters.

Only the Dehy was operating at the time of the inspection.

Records regarding this facility were requested and received prior to the inspection. The records were for the period from October 2021 through August 2022 and indicated the plant only operated during July 2022 and August 2022 during that period.

EUDEHY - Triethylene glycol dehydration system. Equipped with a flash tank and condenser.

EQUIPMENT

- 1.1 The dehydrator was equipped with a flash tank and condenser as required by the permit and the flash tank was connected to the tank VRU system, but the VRU did not seem to be operating. This can be the case when there are no vapors in the tanks.

TESTING

- 1.2 A wet gas analysis of the gas coming in to the EU is required once per year. A copy of the report was not requested.

RECORDKEEPING

- 1.3 Records of the annual wet gas analysis of the gas coming in to the EU is required once per year. Previously reviewed copy not requested.

STACK/VENT RESTRICTIONS

1.4a This stack appears in compliance with criteria listed in the permit and does not appear to have been recently altered. Note that the stack is capped with a pressure relief and is vented to the tank VRU system.

EUKK11CMPENG1 - Natural gas fired reciprocating engine with no controls

EMISSION LIMITS

2.1a NOx emissions are limited to 86 tons per year based on a twelve-month rolling period. Records provided by the facility indicate that NOx emissions average 10.71 tpy, based on a 12-month rolling time-period as of August 2022.

PROCESS/OPERATIONAL LIMITS

2.2 The Malfunction Abatement Plan for this EU was submitted 9/24/07 and approved on 7/08/10.

2.3 The facility is not allowed to bypass any control device for this EU for more than 200 hours per year. The compressor does not have an add-on control device. Therefore, this condition does not apply.

EQUIPMENT

2.4 The facility must maintain a control device for this EU if used. The compressor does not have an add-on control device. Therefore, this condition does not apply.

TESTING

2.5 NOx emissions testing is at the request of the AQD. As of the date of the inspection, testing has not been requested.

MONITORING

2.6 The facility is required to maintain a device to measure natural gas usage for this EU. This device was in place.

RECORDKEEPING

2.7 The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

2.8 A maintenance log for this EU is required to be maintained. The records for 2022 are attached and indicate only minor service on the compressor (no engine maintenance).

2.9 The facility is required to keep records of any bypass of any control device. The compressor does not have an add-on control device. Therefore, this condition does not apply.

2.10 Natural gas usage records for this EU are required to be maintained and included with the monthly emission summary of which a copy is attached.

2.11 NOx emissions records for this EU are required to be kept. These are being performed monthly in a satisfactory manner and copies are attached.

STACK/VENT RESTRICTIONS

2.12A The stack at this facility was previously raised to meet 25 feet minimum height requirement in PTI 638-96A. The stack does not appear to have been altered since then.

FGFACILITY

EMISSION LIMITS

3.1a NOx emissions are limited to 89.9 tons per year based on a twelve-month rolling period. Records provided by Lambda Energy indicate that NOx emissions were 10.71 tons, based on a 12-month rolling time-period as of August 2022.

3.1.b VOC emissions are limited to 40 tons per year. VOC emissions were 0.23 tons, based on a 12-month rolling time-period as of August 2022.

MATERIAL LIMITS

3.2 The facility is required to only burn sweet natural gas. Fuel analysis was not requested.

3.3 The facility is limited to burning 25,500,000 scf of natural gas in EUKK11CMPENG1 AND 54,700,000 scf of natural gas in FGFACILITY per 12-month rolling time period. Records provided by Lambda Energy indicate the total 12-month rolling time period usage was 3,200,000 scf as of August 2022.

PROCESS

3.4 The permittee shall comply with all provisions of 40 CFR Part 63, Subpart HH. The AQD does not have delegation for this NESHAP and has not conducted a determination of compliance for this regulation. The facility was previously determined to meet the exemption from Subpart HH.

RECORDKEEPING

3.5,6,7 The facility is required to complete and maintain records of emissions calculations, and fuel usage monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner and the calculation and fuel usage records maintained.

At the time of the inspection, this facility was in compliance with PTI 638-96A and the Air Pollution Control.

NAME 

DATE _____

SUPERVISOR _____