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

N615231799

FACILITY: LINN Operating INC - Gilchrist Creek 1-35 CPF		SRN / ID: N6152
LOCATION: NE4 NW4 SW4 SEC 35, T29N-R3E, LOUD TWP		DISTRICT: Gaylord
CITY: LOUD TWP		COUNTY: MONTMORENCY
CONTACT: Diane Lundin , Senior EHS Representative		ACTIVITY DATE: 10/12/2015
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

On October 12, 2015, AQD Staff traveled to N6152 Linn Energy (formerly HighMount) Gilchrist Creek CPF located in Loud Township, Montmorency County for a Full Compliance Evaluation (FCE) to determine compliance with PTI-711-96. PTI 711-96 is MOGA and an Opt-Out permit.

The facility was signed as follows: Linn Operating LLC Gilchrist Production, NE/NW/SW Section 35 T29N R3E, In case of Emergency call 231-922-7302.

AQD Staff Gloria Torello and Becky Radulski were present at the inspection.

DEQ Inspection brochures have been previously emailed to Linn Energy.

LOCATION

The facility is located in Loud Township, Montmorency County, SE of Atlanta. From M-32, go south on M-33 to McIntire Road, turn west and travel 1 mile to Abbe Road, turn south. The facility is on the east side of Abbe Road and is not visible from the roadway, there is a sign at the gate by the road. The gate was open.

EQUIPMENT ON SITE

There are 2 engines at the facility in a large white building. One engine is a Waukesha (from records – a Waukesha L7042 GU), which was operating during the inspection and has a catalytic convertor and muffler. The second engine is an Ajax (from records – an Ajax 280) which was not operating and has no control. The Ajax had a sign on the operating panel which read "Warning – do not operate unit! Unit has been preserved for long term storage. Call NGCS personnel." Notes from a 3/3/12 inspection indicate this engine has not been in use since December 2010.

Also onsite was also a dehy and a lined tank farm containing 1 400 bbl tank labeled 'brine' and a smaller tank labeled 'slop'.

REGULATORY DISCUSSION

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydration system is subject to 40 CFR Part 63, Subpart HH, which also has not been delegated to MDEQ from EPA.

INSPECTION NOTES

There is one large building on site with the 2 engines. As mentioned above the Ajax engine was not operating. The stack from the Ajax was located at ground level. The horizontal portion had wood walls to frame the stack, and the inside was filled with dirt encompassing the stack pipe, most likely serving to

reduce noise.

Waukesha Engine:

rpm	918
engine oil temperature	198 F
engine oil pressure	62 psi
Pre-cat Temp	1064 F
Post-cat Temp	1101 F

The pre and post temperatures to the catalytic convertor are within the range specified on page 2 of the MAP.

No VE or odor from the Wauskesha compressor engine stack or glycol dehydrator.

Several oil, used oil, and glycol related tanks/drums were located outside the building in a covered and contained structure. As mentioned above, there was also a lined containment with 2 tanks onsite – 1 400 bbl brine, 1 smaller (approximately 300) bbl slop.

RECORDS REVIEW

PTI 711-96 is a MOGA permit. One of the engines onsite had a catalytic convertor, therefore the facility must maintain an approved PM-MAP. The PM-MAP will be addressed under SC 19, which addresses maintenance activities. The Special Conditions (SC) of the permit are as follows:

SC 13/15. CO, VOC and NOx shall not exceed 89 tons/yr rolling. 12 Month rolling records provided are:CO 11.83 tpy, NOx 8.54 tpy, VOC 0.99 tpy, under the permitted limits. Emission factors are listed in the table and have no issues.

SC 14/15 HAPS - HAPS were reported by the facility as TEG (tri ethylene glycol), less than 1 pound monthly. Ethylene glycol is on CAA list of HAPS.

SC 16, fuel consumption was provided (approximately4.1 MMcf/month for Engine 1, Engine 2 stopped use in December 2010), crude oil/condensate thruput (0 bbls), glycol circulated through dehydrator (0.12 average) in Appendix A format.

SC 19, There is an approved PM-MAP (approval March 20, 2008) on file. The PM-MAP requires that the catalyst inlet temperature normal range to be 750-1350 degree F; catalyst outlet temperature must be equal or greater than the inlet temperature - records indicate approximate averages for inlet and outlet to be 1070 and 1135 degrees F respectively. AFRC O2 sensor was replaced in May and August 2015. Reported catalyst differential was within specified range. Based on the maintenance records provided, the facility appears to be in compliance with the components of the PM-MAP.

SC 20/22 - specific conditions for crude oil/condensate. As indicated in SC 16, there is no crude oil / condensate at this facility.

SC 21 - air pollution control device. 37 hours of operation were reported without the catalytic converter.

SC 23 - stack test if requested by AQD. No test has been requested by AQD.

SC 24 - process only sweet natural gas. The facility confirmed that they operate with only sweet natural gas.

There are no stack height requirements in the permit.

MAERS

The 2016 submittal will be reviewed during the 2016 MAERS season. See MAERS for details.

MACES

MACES Facility and Regulatory screens were reviewed. The facility information and regulatory summary screens were updated.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, N6152 Linn Energy Gilchrist Creek CPF appears to be in compliance with PTI 711-96.

NAME Becky Radulski DATE 11/12/15 SUPERVISOR