

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

N616029442

FACILITY: MARION GAS PLANT		SRN / ID: N6160
LOCATION: 18811 5TH AVE, MARION		DISTRICT: Cadillac
CITY: MARION		COUNTY: OSCEOLA
CONTACT: Roger Freed , Production Superintendent		ACTIVITY DATE: 05/14/2015
STAFF: Kurt Childs	COMPLIANCE STATUS: <i>compliance</i>	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE, compliance inspection and records review.		
RESOLVED COMPLAINTS:		

2015 Full Compliance Evaluation

Site inspection

I conducted a targeted compliance inspection and records review of the Dart Oil and Gas Marion Gas Plant. The Marion Gas Plant is an opt-out facility with PTI 719-96. Initially this plant was built to separate Natural Gas Liquids (NGL) from gas prior to entering the pipeline. According to previous records the facility was built and began operation prior to 1984 and therefore is not subject to NSPS Subpart KKK. The facility currently consists of the following equipment:

- A tank battery currently consisting of 2 pressurized (NGL) tanks with associated truck loading station.
- There is one heater, which was not operating at the time of the inspection. The heater is rated at 7,000,000 BTU/hr.
- There was one small skid mounted dehydrator which was operating at the time of the inspection. The dehy did not have a control device and condensation was being collected in an open stock tank beneath a shed type roof. At the time of the previous inspection on 9/07/2010 there was not an operating dehy. Aerial imagery indicates this dehydrator was in place by 5/23/2013. PTI 719-96 refers to monitoring the glycol circulation rate of the dehydrator and the PTI application estimates annual VOC emissions of 21.75 tons from the dehy.
- The compressor building contained one compressor/engine. The engine is a Caterpillar G342 6 cylinder in line engine and is not equipped with a catalytic converter. The stack appears to meet the dimensions in the PTI Evalform (8" diameter, 18' tall). The engine was running at 1006 rpm, I did not observe any oil pressure or water temperature gauges on the control panel and could not locate an engine inspection log sheet.
- NGL fractionation equipment that is no longer operational.
- The facility is equipped with a flare that was burning at the time of the inspection and there were visible emissions. I conducted a 15 minute visible emission observation and noted a highest 6 minute average opacity of 27.5%. Rule 301 limits opacity to 20% and one 6 min. avg. per hour of 27%. Following the inspection I notified Dart Oil of my observation in case there were process conditions that needed to be addressed.

Records Review

Following the inspection I requested that the company provide the following records:

- Monthly NOx, CO, and VOC emissions calculations.
- Monthly fuel use.
- Glycol circulation rate through the dehydrator.
- Monthly reports of oil and gas processed at the facility.
- Maintenance logs.

Records were provided on 5/27/2015 and are attached to the hard copy of this report. The response confirmed they do not process oil and hydrocarbons. The dehy was operated during the review period at a rate of 0.134 gpm. NOx, CO,

and VOC emission limits are 89 TPY each. Emission calculations for 2014 indicate NOx emissions were 13.226 tons, CO emissions 22.846 TPY, and VOC emissions 1.894 TPY. Fuel usage records were provided with the emission calculations. Maintenance logs provided by Exterran were also included.

The 2014 MAERS report was reviewed and was complete, it also indicated compliance with emission limits.

The results of the inspection and records review indicate the facility is currently in compliance with PTI 719-96.

NAME



DATE

5-28-15

SUPERVISOR

