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

FACILITY: MUSKEGON DEVELOPMENT, LITTLE CRAPO LAKE		SRN / ID: N6188
LOCATION: T29 N R1W SEC 18, CHARLTON TWP		DISTRICT: Gaylord
CITY: CHARLTON TWP		COUNTY: OTSEGO
CONTACT: MICHAEL A MESBERGEN , ENGINEER		ACTIVITY DATE: 10/29/2014
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 Site Inspectio	in,	·······
RESOLVED COMPLAINTS:	-	····

SRN: N6188 Name: Muskegon Development, State Charlton CPF. The facility is also known as State Charlton (Little Crapo Lake) Facility.

Directions. The facility is located in Otsego County, Charlton Township. From Old State Road turn south onto Little Crapo Lake Road and travel about ½ mile to the two-track under the power lines and turn left at the two-track. The facility is about ¼ mile down, and on the left/north side of the two-track.

Application. This is an Antrim gas facility with a "MOGA" permit from the mid-1990s. The application included a compressor engine and a glycol dehydrator.

Permit. The AQD issued permit 742-96 on December 19, 1996. The permit does not include specific equipment. The permit limits CO, VOC, and NOx to 89 tpy. This is an opt-out permit.

Site Visit. There is a fence around the facility. Although the gate was locked, AQD staff viewed the facility from the fence perimeter. There is the main building with the compressor engine, and a smaller white out building. The engine muffler and stack are found outside the main building. The stack is lower than the building roof. The permit does not limit the engine stack dimensions. During the visit, no visible emissions were observed off the stack, although engine noise was noted. Also on site is one tank in a retaining area, and the glycol dehydrator. The site was very tidy.

MAP. The permit does not require a malfunction abatement plan (MAP). The engine does not have control. In MAERS the engine is described as a CAT 3515 LCTA low emitting engine and does not claim control. For these reasons a MAP will not be requested for the engine and facility.

MAERS. The **2013 MAERS** included the glycol dehydrator and CAT 3516 LCTA compressor engine. The 2013 MAERS reported CO 10.8 tons (89 tpy permitted), NOx 9 tons (89 tpy permitted), and VOC 2.4 tons (89 tpy permitted).

The 2013 MAERs used "emission basis other" for the engine emission factors. In the past Torello, AQD staff, worked with the permittee who submitted a formula used to calculate the CO, NOx, VOC emissions. A copy of the formula will be attached to the printed report. On 2/5/15 Torello called Mike Mesbergen and suggested the 2014 fiscal year MAERs include the formula as an attachment if the emission basis is *other*.

Records. AQD requested records on October 29, 2014. On November 6, 2014 AQD received records. Comments on records are below under Permit Conditions.

MACTS. The engines are subject to 40 CFR Part 63 Subpart ZZZZ. The glycol dehydrator is subject to 40 CFR Part 63 Subpart HH . This is an area source (minor for HAPs). The EPA

has not delegated these Subparts to MI AQD and the Subparts were not reviewed.

MACES. Regulatory Info includes:

EPA Class Syn Minor Opt Out, and CMS is checked.

Regulatory Summary:

- HAPs is marked minor.
- NOx is marked Synthetic Minor, and Torello added:
- · SOx Synthetic Minor, and
- CO Synthetic Minor.

Subject to includes:

- FESOP (SM Opt-outs and 208a Sources), and Torello added:
- 40 CFR Part 63 Subparts ZZZZ,
- 40 CFR Part 63 Subpart HH,
- Permit (NSR) 742-96.

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection notes via email.

Permit Special Conditions (SC):

SC 13, 14, 15, and 18. The submitted records show CO, NOx, and VOC are below the permitted limits.

SC 16 & SC 20. The permittee keeps monthly fuel consumption, and glycol use, records. The facility does not deal with crude or trucking hydrocarbon liquids.

SC 19. The permittee provided records of ongoing engine maintenance.

SC 21. The engine does not have a pollution control device.

SC 22. The facility is not subject KKK.

SC 23. AQD has not requested testing.

SC 24. This is an Antrim gas facility with sweet gas.

Compliance. There are not outstanding compliance issues.

Conclusions. Based on the above information, the facility is in compliance with the conditions of permit 742-96.

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SUPERVISOR