

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

N623348013

FACILITY: Lambda Energy Resources LLC - Kalkaska F 24		SRN / ID: N6233
LOCATION: SMITH LAKE RD, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT: Vicki Kniss , Regulatory Affairs		ACTIVITY DATE: 03/28/2019
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2019 FCE		
RESOLVED COMPLAINTS:		

2019 Full Compliance Evaluation: N6233 Lambda Energy LLC Kalkaska F 24, Kalkaska County

I conducted a Full Compliance Evaluation (FCE) of the Kalkaska F 24 to determine compliance with Permit to Install number 101-97 and the air pollution control Rules. This facility is located down a long driveway east from Smith Lake Rd. which is a seasonal Rd. During the winter this road is used as a snowmobile trail and was not plowed. I walked into the site and noted fresh vehicle tracks entering the facility. The facility appeared to be shut in, none of the equipment was operating. Mild odors were detected downwind of the tanks. The weather was clear, 15 degrees F with light wind from the Southwest. At the time of the inspection the following equipment was observed on site:

- Four 400 bbl. AST's with vapor recovery and one blow-down tank.
- One Ajax engine/compressor with no control (Unit 315).
- One small glycol dehydrator located outdoors.
- Three heaters, none of which appeared to be operating.

SC 13. Source-wide CO, VOC and NOx emission limits of 89 TPY each. Company emission calculations for the 2018 12-month period were; CO 0.13 tons, VOC 0.12 tons, NOx 1.17 tons which are each below the 89 tons per year.

SC 14. Maintain HAP emissions below Major source thresholds. Total VOC emissions are less than 10 tons per year.

SC 15. Monthly emission calculations based on a 12-month rolling time-period. The permittee maintains monthly and 12-month rolling calculations of CO, VOC, NOx, SO2 and PM10. Emissions factors from the engine manufacturers data sheet are used in the calculation, which is acceptable. The emission factors from Appendix A are not used.

SC 16. a. Monthly fuel consumption is monitored and recorded on the Engine Specification Calculation Spreadsheet record as "Fuel Usage." There is no limit on Fuel usage. Fuel usage at this facility was minimal, 0.5 MMcf during the 12-month rolling time period.

b. Tank thru-put of crude is monitored and recorded on the Monthly Emissions Summary records. There is no limit on tank thru-put. The records indicate no tank throughput during the review period.

c. Monthly crude oil trucked is monitored and recorded on the Monthly Emission Summary records. There is no limit on the amount of crude oil trucked.

d. The glycol circulated thru the dehydrator is reported in gpm. This is a constant flow in gpm and not an accumulative number for an annual limit. The gpm is used in GRI Gly-Calc emission calculations.

SC 17. The monthly reports are maintained, and examples were provided to AQD.

SC 18. The MAERs is reported annually.

SC 19. Maintenance records are on file and 2018 maintenance records were provided to the AQD and are attached.

SC 20. The tanks are equipped with a vapor recovery system that was not operating at the time of the inspection.

SC 21. This facility has a small rich burn engine that is not equipped with catalytic converters; Therefore, there is no by-pass of pollution control equipment to record.

SC 22. This facility is not subject to Subpart KKK.

SC 23. The AQD has not requested stack testing to verify CO, VOC, NOx, or HAPs.

SC 24. Gas analysis not requested.

As a result of this FCE, it appears that the facility is currently in compliance with PTI 101-97 and the air pollution control rules.

NAME 

DATE 2-28-10

SUPERVISOR SN