

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

N694746939

FACILITY: Devonian Energy (Paxton Resources) Charlton 32		SRN / ID: N6947
LOCATION: SW NE Section 32, T30N R1W, CHARLTON TWP		DISTRICT: Cadillac
CITY: CHARLTON TWP		COUNTY: OTSEGO
CONTACT: Chris Hansen , Maintenance Manager		ACTIVITY DATE: 10/24/2018
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2018 FCE.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation

I conducted a full compliance evaluation including site inspection and records review of the Devonian Energy Charlton 32 CPF located of Fairgrieve Rd. in Charlton Township, Otsego County. The Charlton 32 is an opt-out facility with PTI 45-01A. This facility was originally permitted on February 21, 2001 by Paxton Resources and was revised by Paxton Resources on September 28, 2007 to update the engine and emissions limits. At some point the name of the facility was changed to Devonian Energy but there is no record in the file or in MACES of when or why.

PTI 45-01A identifies the permitted equipment as:

EUDEHY01, a glycol dehydration system processing gas from the Antrim Zone.

EUENGINE01, a Caterpillar G3408TA 450 HP 4-stroke lean burn compressor engine.

Emission limits in the PTI are as follows:

EUDEHY01, None.

EUENGINE01,

- NOx = 89 TPY

FGFACILITY

- NOx = Less than 90 tpy

At the time of the inspection the equipment at the facility matched that in PTI 45-01A. The compressor and engine are located in a small building and a small dehy is located outside the building. At the time of the inspection the compressor engine and dehy were operating. There were no visible emissions from the engine stack, and light vapor emissions along with mild odors from the dehy vent and no visible emissions from the reboiler stack.

The compressor engine stack appeared to meet the permit limits of 9" maximum diameter and 30' minimum height. There is no catalytic converter in the exhaust system. EUENGINE01 was operating at 1005 RPM. Readings on the daily log sheet appeared to match current operating parameters.

This source does have an approved malfunction abatement plan, though there is no catalytic converter.

Following the inspection, I contacted Mr. Chris Hansen of Paxton Resources and requested the following records:

- Dehy MACT exemption demonstration.
- Monthly and 12-month rolling time period NOx emissions calculations.
- Maintenance logs.
- 12-month rolling time period fuel use records.

On 11/14/2018 Mr. Hansen provided the following records which are attached:

- Gas sales, 12-month rolling.
- CO, NOx, VOC emissions 12-month rolling.
- Fuel usage.
- Maintenance logs.

Review of the records indicates that they were complete and up to date. The reported 12-month rolling time period emissions of 19.52 tons NOx were in compliance with the permit limits for NOx of 89.9 TPY. Fuel usage was 17.6 MMCF/year which is below the permit limit of 37 MMCF/year. Maintenance logs are being maintained as required. The facility does not burn sour gas. The Dehydrator is not subject to 40 CFR Part 63, Subpart HH because the actual flowrate of natural gas is less than 85,000 cubic meters per day (highest daily average flowrate in 2018 was 272,000 cubic feet, or 7,702 cubic meters).

The results of the inspection and records review indicate the facility is currently in compliance with PTI 45-01A..

NAME 

DATE 11-14-18 SUPERVISOR 