

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

N718428517

FACILITY: Ward Lake Energy		SRN / ID: N7184
LOCATION: SE NW Sec 12, HAYES TWP		DISTRICT: Cadillac
CITY: HAYES TWP		COUNTY: OTSEGO
CONTACT: Jeff Riling, Operations Manager		ACTIVITY DATE: 02/10/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2015 Inspection		
RESOLVED COMPLAINTS:		

**SRN: N7184. Name: Ward Lake Energy, Hayes 12 CPF**

**Directions.** The facility is located in Otsego County, Hayes Township. From M-32 turn south on South Townline Road, travel about 1 mile and turn west on Van Tyle Road, travel about ¾ mile and turn south onto facility access drive. The facility is about ½ mile down.

**Application.** This is an Antrim gas facility. Permit application 145-04A proposed to:

- Remove a CAT 398 permitted under 145-04, and
- Install a 4-stroke rich-burn spark ignition 325 hp CAT 3406 TA compressor engine. The applicant chose to add a 3-way catalyst.

The facility includes “an exempt glycol dehydrator burner and an exempt glycol dehydrator reboiler” per Permit Cards for permit 145-04.

On June 3, 2011 the AQD issued permit 145-04A per the application proposal, and with the correct SRN N7184 on the cover sheet and letter, however in the header of the permit, an incorrect SRN (N6122) was written.

On January 31, 2012 the AQD revised permit 145-04A with an administrative revision, and corrected the SRN throughout the permit. No technical changes were made with the revision.

There are hand written notes in application 145-04A that include the facility is a “minor source even uncontrolled.”

**MAP.** Permit 145-04A requires a malfunction abatement plan (MAP). On 2/10/15 Torello sent Jeff Riling, N7184, an email requesting he submit a MAP for AQD’s review and approval. On March 6, 2015 AQD received a MAP. The MAP uses the SRN N6122, but should use N7184. On March 24, 2015 Torello reviewed the MAP, with the SRN changed to N7184, the MAP may be approved.

This is a minor facility. A MAERS submittal was not requested for this facility.

**Records.** On 2/10/15 AQD requested records from the permittee. On 2/19/15 the AQD received. A review of records shows 2014 emissions of:

- 2.6 tpy NOx (5 tpy permitted);
- 3.5 tpy CO (6.2 tpy permitted).

**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 is minor, Fee Category is blank, and CMS is not checked.

Regulatory Summary:

- NOx is marked minor.

*Subject to* had the following added:

- 40 CFR Part 63 Subparts ZZZZ,
- 40 CFR Part 63 Subpart HH, and
- Permit (NSR) 145-04A.

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

**Compliance.** A review of AQD files, and MACES report generator, show no outstanding violation.

**Inspection.** The engine operated during the site visit. The engine is inside the building. By visual estimate this is a small compressor engine. The engine had a catalytic converter with the associated wires. The engine muffler is outside the building and horizontal to the ground. By visual estimate the muffler stack meets the permit requirements of a maximum exhaust diameter of six inches, and a minimum height above ground of 40 feet. There was a heat shimmer on the engine's stack and no visible emissions. The glycol dehydrator is outdoors. The glycol dehydrator had exhaust. No odors were noted. There are two tanks in a retaining area. One of the tanks has an exhaust stack. The doors on the building were closed. The engine noise was minimal. Clip boards in the building contain records of the compressor on a monthly basis. Torello noted records for February 2, 7, 8, 9. It is not clear if the engine did not operate on the 1<sup>st</sup>, 3, 4, 5, 6<sup>th</sup>. Torello found no clip board with catalytic converter inlet and outlet temperatures.

**Permit Conditions:**

**EUENGINE1**

**SC. I 1. & 2.** The reported NOx and CO limits are below the permitted limits.

**SC III.1. & 2.** The AQD will approve the MAP. With the approval, recordkeeping will be required of hours the engine operated without control.

**SC IV. 1.** The MAP describes a catalytic converter as add on control.

**SC IV. 2.** Based on records received, a device monitors natural gas usage.

SC IV. AQD did not request testing.

SC VI. The permittee is keeps records per the requirements for existing equipment.

SC. VII. There is no record in the file stating the engine was replaced.

SC IX. The engines are subject to 40 CFR Part 63 Subpart ZZZZ. This is an area source (minor for HAPs). The EPA has not delegated the Subpart to MI AQD and the Subpart was not reviewed.

**Conclusions.** Based onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 145-04A.

NAME

Glenn Inello

DATE

4-6-15

SUPERVISOR



