

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N721760822

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| FACILITY: PAXTON RESOURCES INC., Alba CPF Chestonia 27 | | SRN / ID: N7217 |
| LOCATION: Section 27, CHESTONIA TWP | | DISTRICT: Cadillac |
| CITY: CHESTONIA TWP | | COUNTY: ANTRIM |
| CONTACT: | | ACTIVITY DATE: 11/04/2021 |
| STAFF: Kurt Childs | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: 2022 FCE | | |
| RESOLVED COMPLAINTS: | | |

N7217 Paxton Resources Alba CPF FCE

On November 4, 2021 I conducted a full compliance evaluation including site inspection and records review of the Paxton Resources Alba CPF located in Chestonia Township, Antrim County. The facility is located on Satterly Lake Rd. South of Alba Rd. The Alba CPF is identified as an ROP opt-out source in MAERS but information in the PTI application and evaluation form indicate it is a true minor source with uncontrolled NOx PTE of 64 tpy (also the permit emission limit) based on MAERS emission factors (2,840 lb/MMcfm burned). Emissions also appear to be less than 100 tpy using Caterpillar engine emission factors. The engine is also smaller than 10 MMBtu/hr heat input but has emissions that exceed the significance levels (40 tpy NOx), so is required to be permitted.

The inspection was conducted on November 4, 2021, to determine compliance with PTI 227-03 as well as applicable state and federal regulations. There were no visible emissions and only mild odors from the Dehy vent present at time of inspection.

Equipment at the facility included a Caterpillar 398TA compressor engine and compressor (GCS 175) that is not equipped with a catalytic converter. The permit application indicates it is a 610 hp engine. There is one glycol dehydrator. There is no tank farm at this facility.

A PM-MAP is not required in PTI 227-03. Preventative maintenance activities were included in the application. Daily operation logs were reviewed at the facility and described operating conditions consistent with those that were observed during the inspection.

The glycol dehydrator at the facility is exempt from permitting requirements per R 336.1288 (2)(b)(ii) since it processes gas from the Antrim formation. The Antrim formation is specified in the application but the Dehy did appear to be connected to and Iron sponge type vessel outside the building.

PTI 227-03 - SPECIAL CONDITIONS

1.1 NOx emission limit is 64 TPY.

1.2 Monitor and record the engine's natural gas consumption rate. The engine was equipped with a circular chart that was recording fuel usage at the time of the inspection.

1.3a Maintain records of calculations of monthly and 12-mos rolling time periods NOx emission rates. Paxton provided records of NOx, CO and VOCs emissions. As of October 2021 Rolling 12-month NOx is 14.77 tpy, and CO is 2.85 tpy, VOC emissions are 0.31 tpy. PTI 389-00 only contains an emission limit for NOx, 11 pounds per hour. Based on the records provide, if the engine operated 8760 hours, hourly emissions would be 3.37 lbs./hr.

1.3b Maintain records of monthly and 12-mos rolling time period natural gas fuel usage rates. As of October 2021 the Alba CPF 12 month rolling usage was 20.04 MMcf. Records are attached.

4. Based on visual estimate, the stack appeared to be in compliance with the 12" maximum diameter and 25' minimum height requirements. Exhaust gases are discharged unobstructed vertically upwards to ambient air.

As a result of this inspection the source appears to be in compliance with PTI 227-03 and the Air Pollution Control Rules.

NAME _____

DATE _____

SUPERVISOR _____