

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

N740924211

FACILITY: BreitBurn Operating LP - PDC BOOSTER		SRN / ID: N7409
LOCATION: SE SECTION 12, T25N, R5W, EIGHT POINT RD, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT: Carolann Knapp , Environmental Specialist		ACTIVITY DATE: 01/21/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Field Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Tuesday, January 21, 2014, Ms. Caryn Owens of the DEQ-AQD conducted a scheduled field inspection of the Breitburn Operating, LP (Breitburn) – PDC Booster site located in the northwest corner of Eight Point Road and Kalkaska County Line Road in Garfield Township, Kalkaska County, Michigan (SRN: N7409). The field inspection and records review were to determine compliance with permit to install (PTI) 253-04. The site is currently an area source that has opted out of being a major source by limiting the operational and/or production limits potential to emit (PTE) to be below the major source thresholds. An inspection brochure was not given to anyone at this facility. The site is an area source for National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart HH, and NESHAP 40 CFR Part 63 Subpart ZZZZ. However, the State of Michigan does not have delegated authority of the area source NESHAPs, and thus the NESHAP regulations were not reviewed by the DEQ.

#### On-site Inspection:

During the field inspection it was cloudy and approximately -10°F, with calm winds. DEQ observed a sign on the southwest corner of the building stating it was the Breitburn Beaver Creek PDC Booster site. The site consisted of a small building containing a separator unit, and a 700 hp CAT 398 TA HCR rich burn, 4-stroke reciprocating internal combustion engine (RICE) with a serial # 6CB06104 (observed on the engine plate on the east side of the engine) containing a catalyst. Outside consisted of a glycol dehydrator system with a reboiler, a production unit, and an approximately 100-bbl blowdown tank. The engine stack was in the vertical direction extruding from the northern portion of the building, approximately 25 feet above ground surface. The glycol dehydrator stack was approximately 20 feet above ground surface located on the northern portion of the site. A separated white steam plume was observed from the engine stack and the glycol dehydrator reboiler stack but the steam plumes quickly dissipated. No odors were present during the inspection. The engine was operating at 896 rpm, at 180°F and 70 psi. The pre-catalyst temperature was 892°F and post-catalyst was 952°F. Additionally, two approximately 100-gallon above ground storage tanks (ASTs) were observed in secondary containment that contained engine oil, and an approximately 100-gallon AST in secondary containment containing waste oil.

#### Compliance Evaluation:

**EUICE:** EUICE consists of a natural gas fired internal combustion, 700 hp CAT 398 TA, engine driving a compressor.

#### Emission Limits

1.1: NOx emissions are not to exceed 88 tons per year based on a 12-month rolling period. Based on the records reviewed, NOx emissions ranged between 32-35 tons per 12-month rolling period from December 2012 – December 2013 which was below the permitted emission limits.

#### Material Usage Limits and Monitoring

1.2 & 1.3: More than 51,508,800 cubic feet (51.5 MMscf) of natural gas shall not be burned per year. Based on the records reviewed, the natural gas burned at the site ranged between 19.0-20.5 MMscf per 12-months from December 2012 – December 2013.

#### Recordkeeping/Reporting/Notification

1.4: The volume of fuel burned in EUICE ranged between 1,472 Mscf/month to 1,832 Mscf/month from December 2012 – December 2013. Monthly NOx emissions ranged between 2.5 tons per month – 3.11 tons per month, and as stated above, NOx emissions ranged between 32-35 tons per 12-month rolling period.

#### Stack/Vent Restrictions

**1.5:** Based on the field inspection, the stacks of SVICE and SVDEHY appeared to be in accordance with the permitted limits of 8 inch diameter and 21 feet above ground surface for SVICE and 2 inch diameter and 20 feet above ground surface for SVDEHY.

**Summary**

The activities covered during the field inspection and records review for the facility indicate the facility was in compliance with emission limits in accordance with the PTI 253-04.

NAME *Cynthia Owens*

DATE *1/31/14*

SUPERVISOR 