

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

N745329641

FACILITY: BREITBURN OPERATING - BRADY BUNCH/LITTLE RASCALS		SRN / ID: N7453
LOCATION: SEC 5 T30N R6E NW SW SE, LACHINE		DISTRICT: Gaylord
CITY: LACHINE		COUNTY: ALPENA
CONTACT: Carolann Knapp,		ACTIVITY DATE: 05/07/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 Inspection.		
RESOLVED COMPLAINTS:		

Directions. The facility is located in Alpena County, Green East Township, SE4, SE4, SW4, Section 2, T31N, R3E. From M-65 turn east on Wagner Road, travel about ½ mile, the facility is on the north side of the road.

Application. This 2005 application for an Antrim gas CPF included:

- one Cat 3516 TALE,
- a glycol dehydration system,
- two brine storage tanks 400 barrels each, and
- one 300-gallon methanol storage tank.

Permit. On March 28, 2006 the AQD issued opt-out permit 235-05. The Eval Form includes, "the methanol storage equipment is not exempt under Rule 284... the methanol storage tank equipment is included in the permit to avoid having to do monthly Rule 290 calculations, but no special conditions are needed due to the exempt status." The permit includes:

- one natural gas fired reciprocating engine, and a
- glycol dehydration system.

MAP. On August 9, 2007 AQD approved the malfunction abatement plan (MAP). The MAP includes:

- one Cat 3516 lean burn with no control and no AFRC.

MAERS. The **2014 MAERS** did not include emissions from the methanol storage equipment. The 2014 MAERS included these facility wide emissions:

- 11.3 tons CO (22.4 tpy permitted for EUENGINE, and 89 tpy for FG FACILITY), and
- 23.9 tons NOx (45.4 tpy permitted for EUENGINE, and 89 tpy for FG FACILITY).

Records. Breitburn consistently maintains their records, and makes records available to AQD upon request. The records demonstrate compliance with the permit limits and MAP. The submitted records included:

- Natural gas throughput (there is not a permit limit on throughput),
- NOx and CO emission rates from EUENGINE, and FG FACILITY,
- Certificate of Analysis for the gas (Hydrogen Sulfide was non-detect), and
- Compressor engine maintenance log.

MACTS. The engine is 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 Subparts ZZZZ and HH to MI AQD and the Subparts were not reviewed.

MACES' Facility Information and Regulatory Information were reviewed and updated as needed.

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

Compliance. A review of MACES report generator shows no outstanding violation.

Inspection. The engine operated during the site visit. The engine stack had no visible emissions. Ear plugs are needed because of engine noise. The building doors were open. There is a collection of old pipes and metal objects stored on the property, other than that the site is tidy. The engine does not have a catalytic converter. There are two large tanks in a retaining area-which has a liner and had no standing water. The engine

muffler is outside of the building. By visual assessment, the engine stack meets the permit requirements of a maximum of 16 inches in diameter and 36 feet above the ground. Clip boards on site contain records of engine operating parameters including: RPM, oil pressure, oil temperature, water pressure, water temperature, and suction pressure. There is an empty cement pad where four snow mobiles are stored.

Permit Conditions:

EUENGINE

SC 1.1a & b, 1.11. Records from the permittee and MAERS show 12-month rolling NOx emissions below the permitted 45.4 tpy, and CO emissions below the permitted 33.4 tpy.

SC 1.2, 1.3, 1.4, 1.8. The AQD approved a MAP for the facility.

SC 1.5. Breitburn submitted a Certificate of Analysis showing the gas has a hydrogen sulfide content of Non-Detect. Rule 119(i) defines sour gas as containing more than 1 grain of Hydrogen Sulfide, which is equal to 15.9 ppm(v).

SC 1.6. Submitted records show natural gas usage is monitored and recorded. The permit does not limit natural gas throughput.

SC 1.7. Calculations are available to the AQD.

SC 1.9. Not applicable, the engines are not controlled.

SC 1.10. Fuel use records are kept.

SC 1.12.a & b. A visual estimate showed the muffler stack dimensions comply with the permit conditions.

FGFACILITY

SC 2.1a. & b. Records from the permittee show 12-month rolling NOx and CO emissions below the permitted 89 tpy.

SC 2.2, 2.3. Breitburn submitted a Certificate of Analysis showing the gas has a hydrogen sulfide content of Non-Detect.

SC 2.4, 2.5, 2.6. Records are kept.

Conclusions. Via onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 235-05.

NAME

Gloria Inello

DATE

6-4-15

SUPERVISOR

[Signature]