

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

N752329769

FACILITY: BREITBURN OPERATING LP-Elk Ridge CPF		SRN / ID: N7523
LOCATION: T31N R2E SECTION 11, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 06/09/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and record review		
RESOLVED COMPLAINTS:		

**Site Inspection:**

On June 9, 2015, I inspected the Elk Ridge CPF. I did not find any violations of Air Quality rules or of Permit 245-05.

The facility appears unchanged from previous inspections.

The facility includes two 400-barrel size tanks. The tanks don't have any truck load-out capacity. They are piped to a well labeled Permit 52069 Emergency 989-732-0869, State Briley A1-11 SWD, N Briley Twp, Montmorency Co. Mi, SW 1/4 NW 1/4 NW 1/4 Sec 11 T31N R02E. The SWD on the sign indicates this is a salt water disposal well. That and the fact that the tanks don't have load-out capacity as they would if they contained oil indicates they are probably brine tanks. The tanks are enclosed by a lined berm which appears to be in good condition.

The facility includes one compressor engine and a glycol dehydrator. The stacks for the compressor engine and dehy burner were both unobstructed vertically upward.

Permit 245-05, Condition 1.12, requires the engine stack have a maximum diameter of 16 inches and minimum height of 36 feet. The stack appeared to meet these requirements, estimating by eye.

The dehydrator burner has a capacity of 200,000 btu (presumably btu per hour) according to its builder plate. I estimated the dehy burner stack as about 8 inches diameter and 25 feet high. The permit doesn't contain any required dimensions for this stack.

The facility includes one medium sized Caterpillar natural gas-fired compressor engine with no catalytic oxidizer. (Documentation previously given states the engine here is a lean burn type without catalytic oxidizer.) The digital engine controller display indicated 46077 hours of operation, 1104 RPM, 27 volts, 51 PSI oil pressure and 210 degrees f coolant temperature. There was a warning light flashing on this panel but the engine was running with no opacity and with no unusual vibration. (Note that a previous inspection here, in 2011, said this light was also flashing at that time.)

I noted various small tanks:

Four drum-on-stilt type tanks near the dehy. One was labeled triethylene glycol, one as methanol, two were not labeled. The labeled tanks appeared about the common 300 gallon size, the unlabeled ones were smaller.

One 300 gallon drum-on-stilt type tanks near the engine labeled as engine oil.

One orange tank labeled as used oil. It was considerably larger than the 300 gallon drum on stilt engine oil tank.

3-55 gallon steel drums labeled as waste, used oil filters.

Maintenance appeared good.

Record Review:

Permit 245-05, Table EUENGINE, Special Condition 1.8, requires maintaining a maintenance log as specified in a Malfunction Abatement Plan. A copy of this log is attached.

Condition 1.9 requires keeping track of any hours operating without the installed control device, if applicable. Records submitted indicate there is no add-on control device, so this does not apply. The inspection confirms there is no add-on control device. The engine is equipped with an air to fuel ratio control system, with control box mounted inside the compressor shed. It is a lean burn type with no catalytic oxidizer.

Condition 1.10 requires monthly fuel use records. These are being kept. Fuel use for May 2014 was 3.4 MMCF.

Condition 1.11 requires monthly and 12-month NOx emission estimates. These were provided. For May, NOx was 2.06 tons/month and 25.0 tons/12 months. Permit limit is 45.0 tons/12 months.

Condition 1.12 requires monthly and 12 month CO emission estimates. These were provided. For May, CO was 0.98 tons/month and 11.8 tons/12 months. Permit limit is 33 tons/12 months.

Table FGFACILITY, condition 2.5, requires monthly and 12 month NOx and CO records. These records were provided. The vast bulk of the emissions come from the engine; total facility NOx is listed as 2.1 tons/month and 25 tons/12 months for May, vs. 2.06 tons/month and 25 tons/12 months for the engine alone. Facility CO was 1 ton/month and 12 tons/12 months vs. 0.98 tons/month and 11.8 tons/12 months for the engine alone.

Breitburn has elected to show compliance with NSPS HH by tracking the volume of gas processed through the dehydrator. They state that daily average gas throughput was 1,492 Mscf per day in May, which is equivalent to about 42,250 scm. The dehydrator is exempt from the more stringent control requirements of NSPS HH because these apply only if average throughput is 85,000 scm or more per day.

NAME William J. Rogers Jr.

DATE 6/12/2015

SUPERVISOR

