

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

N756029226

FACILITY: BreitBurn Operating LP - MOSSBACK CPF		SRN / ID: N7560
LOCATION: SE4 SE4 SW4 SECTION 2 T31N R3W, LIVNGSTON TWP		DISTRICT: Cadillac
CITY: LIVNGSTON TWP		COUNTY: OTSEGO
CONTACT: Carolann Knapp , BreitBurn Management		ACTIVITY DATE: 04/22/2015
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site inspection and records review		
RESOLVED COMPLAINTS:		

AQD staff traveled to Otsego County to perform a scheduled inspection of Breitburn's Mossback CPF. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 348-05 and applicable state and federal air regulations. Facility personnel were not present at the time of the inspection. A pamphlet titled "Environmental Inspections: Rights and Responsibilities" was provided to Ms. Carolann Knapp of Breitburn previously. Facility coordinates based on MAERS is 45.10 -84.6346.

The facility consisted of one compressor engine, two storage tanks, and a glycol dehydrator. The compressor engine and glycol dehydrator were operating at the time of the inspection. No visible emissions were observed from the compressor engine stack at the time of the inspection.

1. EUENGINE - Natural gas fired compressor engine. Currently, the engine is a CAT 399 TA (Serial No. 49C01342), which is a rich burn engine and is equipped with a catalytic converter. This engine replaced a CAT 3516 TALE in 2012.

A. EMISSION LIMITS - 12 month rolling NOx and CO emissions are limited to 45.4 tons and 33.4 tons, respectively. Emission calculations submitted by Ms. Carolann Knapp (attached) show the highest 12 month rolling NOx emissions in 2014 was 4.07 tons and the highest 12 month rolling CO emissions in 2014 was 6.9 tons. Review of the records show that the facility is in compliance with the emission limits.

B. MATERIAL LIMITS - There are no material limits associated with this emission unit; therefore, this section is not applicable.

C. PROCESS/OPERATIONAL LIMITS - The facility is required to have an AQD approved preventative maintenance (PM) plan for the compressor engine. Staff review of the files shows that an updated PM plan was submitted in April 2012 to reflect the change in compressor engines.

The current engine is not allowed to operate more than 200 hours per 12 month rolling time period without the control device. Records submitted by Breitburn indicates the engine operated 0.5 hours per 12 month rolling time period from April 2014 to September 2014.

D. EQUIPMENT RESTRICTIONS - The engine is not allowed to operate unless the catalytic converter is installed, maintained and operated. During the inspection, AQD staff observed that a catalyst was installed and the pre- and post-catalyst temperatures were 960°F and 990°F, respectively.

E. TESTING - Testing to verify CO and NOx emission factors is only required upon AQD request. The AQD has not required any testing at this time.

F. MONITORING/RECORDKEEPING - As required by the permit, a monitor located on the northeast corner of the building was installed for continuously monitoring the fuel consumption of the compressor engine.

Maintenance activities performed on the compressor engine are recorded and made available to the AQD (attached). The maintenance performed on the engine appeared to be consistent with the activities listed in the PM plan.

Monthly fuel use records as well as monthly and 12 month rolling NOx and CO emission calculations are adequately maintained and provided to AQD upon request (attached).

G. STACK/VENT RESTRICTIONS - The compressor engine exhaust stack appeared to be consistent with the minimum height and maximum diameter listed in the Permit to Install.

2. FGFACILITY - All process equipment at the facility including equipment covered by other permits, grand fathered equipment and exempt equipment.

A. EMISSION LIMITS - 12 month rolling NOx and CO emissions are both limited to 89 tons. Emission calculations submitted by Ms. Carolann Knapp (attached) show the highest 12 month rolling NOx emissions in 2014 was 4.2 tons and the highest 12 month rolling CO emissions in 2014 was 6.9 tons. Review of the records show that the facility is in compliance with the emission limits.

B. MATERIAL LIMITS - The facility is allowed to only burn sweet natural gas. Stain tube testing resulted in non-detectable concentrations of hydrogen sulfide; therefore, the gas is considered "sweet".

C. PROCESS/OPERATIONAL LIMITS - There are no process or operational restrictions associated with this flexible group; therefore, this section is not applicable.

D. EQUIPMENT RESTRICTIONS - There are no equipment restrictions associated with this flexible group; therefore, this section is not applicable.

E. TESTING - Testing to verify the H2S concentration of the gas was requested by AQD staff. Results are attached.

F. MONITORING/RECORDKEEPING - 12 month rolling NOx and CO emission calculations are adequately maintained and provided to AQD upon request (attached).

G. STACK/VENT RESTRICTIONS - There are no stack or vent restrictions associated with this flexible group; therefore, this section is not applicable.

CONCLUSION - Based upon the on-site inspection and records review, AQD staff considers the facility to be in compliance with Permit to Install No. 348-05.

NAME Shane Nixon

DATE 4/24/15

SUPERVISOR 