

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

N825653323

FACILITY: RIVERSIDE - LLOYDS OF LONDON CPF		SRN / ID: N8256
LOCATION: SE NWNE SEC 18 T31N R3E, HILLMAN		DISTRICT: Gaylord
CITY: HILLMAN		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 04/15/2020
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Field inspection for FCE		
RESOLVED COMPLAINTS:		

On April 10, 2020, I inspected the Riverside Energy LLC Lloyd's of London CPF. This facility is covered by Permit to Install 84-09B, issued September 15, 2010. I did not find any violations during my inspection.

Permit 84-09B, Table EUENGINE, Condition IV.1, requires that an add-on control device (if any was included) must be installed and operated properly. During my inspection I saw a catalytic oxidizer in the engine exhaust stack. It appeared to be installed and operating properly. Records submitted by Riverside claimed it was operating properly; this was documented in a previous activity report. During the inspection I took outside temperatures at inlet and outlet of the catalytic oxidizer using a remote infrared thermometer, I got 695 degrees f on the pipe upstream of the catalytic oxidizer and 725 degrees f on the pipe downstream. If the temperature across the catalytic oxidizer increases, the device must be burning contaminants from the exhaust stream passing through it. This suggests that it is operating properly.

Condition VI.2 requires a device to monitor natural gas fuel use in the engine. Records submitted by Riverside include fuel flow to the engine, which suggests a device for measuring fuel flow is included. During my inspection I found a digital display in an electronics box on the outside of the compressor shed. One of the values it showed in rotation was fuel flow to the engine. It claimed that fuel flow the previous day was 81.7 Mcscf and 724.7 Mscf per month. This indicates a device to measure fuel flow is installed and operating.

Condition VIII.1 sets stack dimensions as a maximum exhaust diameter of 12 inches and a minimum height above ground of 36 feet. The stack appeared to meet these requirements.

Table FGFACILITY, Condition II.1, prohibits burning sour gas as fuel at the facility. I did not see or smell anything that would make me think there was any sour gas being burned or processed at the facility.

COMMENTS

The facility is located off Brush Creek Truck Trail, east of M-33, north of Atlanta. There is no special difficulty in reaching it.

The facility includes one Caterpillar natural gas-fired compressor engine with catalytic oxidizer. The engine was operating at the time of my inspection. It is labeled as GCS 573 in metal characters welded to the engine skid, identifying it as Unit 573 formerly owned and operated by Gas Compression Services Inc. Engine instruments said it was operating at 1180 RPM, with engine oil pressure 60 psi, compressor oil pressure 55 psi, and engine coolant temperature 180 degrees f.

The engine exhaust leaves the compressor shed horizontally to a horizontal muffler. After that it turns to exhaust unobstructed vertically upward through a tall stack. There was no opacity in the stack.

There is a glycol dehydrator. It had a flame arrested burner rated at 200,000 BTU per hour heat input, according to its burner plate. The burner stack was about 6 inches in diameter and 20 feet tall, exhausting unobstructed vertically upward. The still vent exhausts through the wall of the shed at about 10 feet above ground level. It was about 2 inches diameter ending in a T fitting. The dehydrator was not operating at the time of my inspection; there was a Riverside employee doing maintenance on it.

Tanks on site included:

One 400 barrel brine tank inside a lined berm. It was labeled Caution, Non-Potable Water, Industrial Waste. It was piped to Riverside Energy Michigan St. Hillman A3-18 SWD Permit #57602, T31N R3E Sec 18 SW1/4 NW1/4 NE1/4 Hillman Twp, Montmorency Co.

One oval metal tank under the roof overhang near the radiator end of the engine. It was over a lined wooden berm. It was probably engine coolant.

Two 300 gallon drum on stilts tanks near the glycol dehydrator. They were over a lined wooden berm structure. They had a tarp fastened over them so I could not see any labels they might have. Typically one of these would be ethylene glycol and the other methanol.

Inside the shed, near the engine, two 300 gallon drum on stilts tanks, one labeled Chevron HDAX Low Ash Gas Engine Oil and the other Chevron Regal ISO 100 oil.

Inside the shed near the engine, on the floor, one orange tank labeled used oil.

Maintenance appeared to be adequate. I didn't see any leaks or spills. I didn't see any stained soils indicating there had been any leaks or spills in the recent past. I didn't notice any odors or any unusual vibrations. There was no opacity from any equipment at the facility during my inspection.

NAME _____

DATE _____

SUPERVISOR _____

William Rogers Digitally signed by William Rogers
Date: 2020.04.22 11:58:28 -0400

Shane Nixon Digitally signed by Shane Nixon
Date: 2020.04.22 11:59:26 -0400