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

N831128461

FACILITY: Presidium Energy LC, Pleasanton 26		**SRN / ID:** N8311
LOCATION: SEC 26, PLEASANTON TWP		**DISTRICT:** Cadillac
CITY: PLEASANTON TWP		**COUNTY:** MANISTEE
CONTACT: Shane Miller ,		**ACTIVITY DATE:** 12/17/2014
STAFF: Caryn Owens	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Wednesday, December 17, 2014, Caryn Owens of the DEQ-AQD conducted a scheduled on-site inspection of the Presidium – Pleasanton 26 CPF (N8311) located in Section 26 Township 24 North, Range 15 West in Pleasanton Township, Manistee County, Michigan. More specifically, the site is located on the south side of Norkonk Road, and the entrance to the facility is approximately ½ east of Chief Road and Norkonk Road intersection. There is an access gate at the entrance to the facility with a lock, but the lock was open at the time of the inspection. DEQ traveled approximately ½ on a two track to enter the facility, after the gated entrance.

The purpose of this inspection was to determine the facility's compliance with permit to install (PTI) 185-09. The site is currently an opt-out (synthetic minor) source for NOx. DEQ was unaccompanied during the field inspection; an inspection brochure was not given to anyone at this facility, but will be emailed with this activity report. 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. The State of Michigan does not have delegated authority of the area source NESHAPs, and thus these areas were not reviewed by the MDEQ at this time. The weather conditions were cloudy and snowing, with winds from the west-northwest approximately 15-20 mph, and 27ºF.

The equipment at the site consisted of a main building containing: an inlet scrubber iron sponge; a vertical separator; and two compressor engines (one on the east side of the building and one in the south side of the building). There was a storage area inside the eastern portion of the building where there appeared to be a former engine. An iron sponge was located southeast of the building, a glycol dehydrator was located south-southwest of the building, and a flare was located west of the building and glycol dehydrator system. There was an approximately 400-bbl above ground storage tank and a 100-bbl storage tank on the northwest corner of the site. The remainder of the site consisted of storage equipment. DEQ observed steam plumes from the glycol dehydrator stack, the glycol dehydrator process heater and both engine stacks. Slight petroleum-like odors were present east and northeast of the glycol dehydrator, but dissipated quickly. The glycol dehydrator stack was approximately 10 feet above ground surface and associated process heater stack was approximately 20 feet above ground surface. The compressor engine in the eastern portion of the building was Caterpillar engine, with a nameplate on the eastern side of the engine, but it was difficult to read. The engine block read BATB 30, and was uncontrolled operating at 1267 RPM and 60 psi. The engine stack contained a muffler, and was approximately 30 feet above ground surface. The southern compressor engine was smaller than the eastern engine, and was a Caterpillar engine. A nameplate could not be located on this engine, but the facility identifies it as Unit 512. This engine was uncontrolled and operating at 1220 RPM and 60 psi. The engine stack contained a muffler, and was at least 30 feet above ground surface. The engine paperwork was not completed on a daily basis, but the information filled out on the sheets appeared to be consistent. DEQ contacted the company regarding the onsite flare, since there are no records of a flare in the PTI, PTI evaluation, or PTI application. The company indicated the flare at the facility was required by the Area Geologist since there is a relief valve system at the Pleasanton facility to prevent the facility from over-pressuring. If the relief valve system were to be activated (which, according to the company, is an extremely unlikely scenario) then the gas that is vented though the system would be directed to the flare stack, instead of just directly to the atmosphere.

Records Reviewed

EU00003: The glycol system processing gas from the Antrim zone. The applicable requirements of this emission unit are regulated by the NESHAP 40 CFR Part 63 Subpart HH, and the DEQ does not have delegation for the NESHAP. So these areas were not addressed. DEQ did request the GRI-GLYCalculations for the facility, and based on the dehydrator emissions inventory no benzene was in the glycol dehydrator system, and the total VOC emissions were reported at 0.0424 tons per year. Additionally, according to the company the glycol dehydrator has a maximum heat input of 50 MMBTU per hour and the company is claiming exemption R336.1282(b)(i) for the dehydrator process heater.

FGENGINES: Includes EU00001 and EU0002 natural gas fired reciprocating engines. According to the PTI evaluation form and facility records , EU00001 is the eastern engine (215 hp CAT 3406, BATB 30) and EU00002 is

the southern engine (145 hp CAT 3306, Unit 512).

- **Emission Limits:** The facility is limited 48.9 tons per 12-month rolling time period of NOx and 3.5 tons per 12-month rolling time period of CO for EU00001 (eastern engine). Based on the records reviewed, the highest emissions between November 2013 through November 2014 was 29.6 tons per 12-month rolling time period for NOx and 1.9 tons per tons per 12-month rolling time period for CO for EU00001.
  The facility is limited 31.3 tons per 12-month rolling time period of NOx and 2.5 tons per 12-month rolling time period of CO for EU00002 (southern engine). Based on the records reviewed, the highest emissions between November 2013 through November 2014 was 13.3 tons per 12-month rolling time period for NOx and 1.0 tons [redacted] per 12-month rolling time period for CO for EU00002. The emissions are compliant with the permitted limits.
- **Materials/Fuels:** No material limits were applicable for FGENGINES.
- **Process/Operational Parameters:** The facility submitted a Malfunction Abatement Plan (MAP) on December 23, 2009. The equipment addressed in the MAP is consistent with the PTI and actual onsite conditions. The facility submitted the engine maintenance logs for DEQ to review. Based on the review of the maintenance logs, general service was completed on the engines such as: oil changes; replacing filters; gaskets; and valves. The records did not show maintenance concerns with the engines.
- **Testing Sampling Equipment:** The facility used engine specific emission factors to calculate the emissions for NOx and CO. Performance testing has not been completed at this facility.
- **Monitoring/Recordkeeping:** The facility monitors the natural gas usage for FGENGINES on a continuous basis and records the monthly fuel use for each engine at the facility. The facility records monthly and 12-month rolling time period records for NOX and CO. The 12-month rolling time period is discussed above under emission limits. The highest monthly emissions between November 2013 through November 2014 was 3.4 tons per month for NOx and 0.2 tons per month for CO for EU00001 (eastern engine). The highest monthly emissions for EU00002 (southern engine) was 1.8 tons per month for NOx and 0.1 tons per month for CO.
- **Reporting:** The facility has not swapped out an engine at the facility since the PTI was issued.
- **Stack/Vent Restrictions:** Based on visible observations during the field inspections, the stacks of the engines appeared to be at least 33 feet above ground surface.

FGFACILITY: Based on discussions with the facility, no sour gas burned at the facility.

Evaluation Summary: Based on the field inspection and records review, the facility is in compliance with PTI 185-09, and no further actions are necessary at this time.

NAME Caryn Owens DATE 2/5/15 SUPERVISOR