

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

P000632933

FACILITY: CHEVRON MICHIGAN, LLC - CENTRAL LAKE 15 CPF		SRN / ID: P0006
LOCATION: Central Lake 15 CPF, CENTRAL LAKE		DISTRICT: Gaylord
CITY: CENTRAL LAKE		COUNTY: ANTRIM
CONTACT: Natalie Schrader ,		ACTIVITY DATE: 01/12/2016
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE 2016		
RESOLVED COMPLAINTS:		

SRN: P0006 Name: Chevron, Central Lake 15 CPF

**Directions:** The facility is located in Antrim County, Central Lake Township. The facility is not visible from the road. The access driveway is not marked. There are two ways to access the facility. In summer, the access drive to the facility is located on the east side of M-88, 1/8 mile north of Kiessel Rd. The access driveway is through a large elk farm on the east side of the road, use the north farm driveway. The access road goes up a hill and to the right. The CPF is located 'behind' the hill. In the winter, access the facility through the Recycle Center just south of the elk farm.

**Application:** This is an Antrim gas facility. The application included the permanent removal of one compression engine from the facility.

**Permit.** On February 25, 2015 the AQD issued permit 254-09B which includes one compressor engine. The engine is permitted to emit a maximum of NOx 60 tpy, and CO 30 tpy. Because the permit allows engine replacement with an equivalent or lower emitting engine, including a higher emitting engine with control, this is an opt-out permit.

In the permit that Lansing staff sent to Gaylord, the cover page includes permit to install number "254-09B." In the header of the permit, the permit number is 254-09A. On the AQD website the permit has the correct permit number 254-09B on all pages. Torello communicated with Natalie Schrader of Chevron to assure the permittee has the correct version of permit 254-09B. Torello communicated with Lansing staff to assure the correct permit is on file in Lansing.

**Malfunction Abatement Plan (MAP):** On November 16, 2015 the AQD approved an updated MAP. The updated MAP changed 3-way catalyst to oxidation catalyst. The MAP includes one engine and describes the engine as a lean burn CAT G3516 engines with an oxidation catalyst.

**MAERS:** The 2014 MAERS reported facility wide emissions of:

- NOx 22.2 tons (60 tpy permitted),
- CO 4.36 tons (30 tpy permitted).

**MACTS:** The facility is a true minor facility for HAPs (below 10/25 tpy for individual/total HAPs) making the facility an area source for the MACT:

- 40 CFR, Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines for Area Sources.

The EPA has not delegated this Subpart to MI AQD and the Subpart was not reviewed.

**MACES:**

- Facility Information was reviewed. To Description was added: Antrim gas central production facility.
- Regulatory Info was reviewed. Subject To was updated to include 40 CFR Part 63 Subpart ZZZZ.

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

**Compliance:** A review of AQD files and MACES report generator shows no outstanding violation.

**Records & Inspection:**

On January 12, 2016 Gloria Torello of AQD staff made an inspection of the facility. Torello had follow up questions and communicated with Ms. Natalie Schrader from Chevron on January 6, 2016.

**Records:** The permittee provided August-November 2015 records of engine operation. The engine operation records do not include catalyst inlet and outlet temperatures readings. Natalie Schrader provided a record of monthly catalyst inlet and outlet temperatures. The approved MAP includes daily recordings of catalyst inlet and outlet temperatures. Torello communicated to Natalie it is AQD expectation daily catalyst inlet and outlet temperatures readings and recordings will be made. Natalie said she will communicate this to her staff.

A review of records shows the reported NOx and CO emission are below the permitted limits.

The permittee provided maintenance records. The permittee demonstrated ongoing compliance with the permit's record keeping requirements.

**Inspection**

There is one engine on site. The engine was operating during the January 12, 2016 site visit. The engine has a catalytic converter. No visible emissions were observed from the engine stack. By visual assessment, the engine stack meets the permit requirements of a maximum of 12 inches in diameter and a minimum of 50 feet above ground height. Also on site are one tank in a retaining area, and two iron sponges.

**Permit Conditions:**

**Emission Limits**

I. & VI. 6. & 7. Records show NOx and CO emissions below the permitted 60.0 tpy and 30.0 tpy respectively.

II. & V.2 There are two iron sponges on site. AQD does not require a permit for an iron sponge. Per condition V.2, the permittee provided H2S readings showing the gas has less than 15.9 ppm H2S, making the gas not sour.

III. 1. There is an AQD approved MAP for the facility.

III.2, IV, & VI.4. Records show the engine operated with the catalyst

V.1. AQD has not requested a verification of NOx and CO emission factors.

VI. 1. 2. & VI.5. Calculations are completed and made available to AQD. Natural gas usage is monitored, the permit does not limit natural gas usage.

VI.3. There is a log of maintenance activities conducted per the MAP.

VII. There is nothing in the file indicating a replacement engine was installed.

VII. By visual assessment, the engine stack meets the permit requirements.

**Conclusions:**

The records do not include catalyst inlet and outlet temperatures. AQD staff will follow up with the permittee.

Via onsite inspection, review of records, and discussion with Chevron staff, the permittee demonstrates compliance with the conditions of permit 254-09B.

NAME Gloria Inello

DATE 1-20-16

SUPERVISOR 

