

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P003959548

FACILITY: RIVERSIDE - VIENNA 14 CPF		SRN / ID: P0039
LOCATION: NE SE SW Section 14 T30N-R1E, VIENNA TWP		DISTRICT: Gaylord
CITY: VIENNA TWP		COUNTY: MONTMORENCY
CONTACT: Natalie Schrader , Compliance Coordinator		ACTIVITY DATE: 08/27/2021
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2021 scheduled inspection. Activity includes review of records requested by B. Rogers, but review not documented. sgl		
RESOLVED COMPLAINTS:		

On August 27, 2021, AQD District Staff performed a scheduled site inspection at the Riverside Energy Group (Riverside), Vienna 14 CPF, located on Camp 8 Road, Vienna Township, Montmorency County, Michigan. SRN No. P0039. The facility is permitted under Permit to Install No. 18-10 issued on February 1, 2010. The purpose of the site inspection was to confirm operation of the facility in compliance with the referenced permit. The most recent site inspection was conducted on April 28, 2017, no compliance issues were noted.

In addition to onsite observations, this report documents records review for 2020 compliance records submitted per request of AQD District Staff by the Facility on October 2, 2020. Ms. Natalie Schrader of Riverside provided records for review upon request and in a timely manner. Review of the documents had not previously been documented by District Staff before retirement.

Weather conditions at the time of inspection were heavy rains, winds > 10 mph with overcast skies and 68 degrees Fahrenheit.

FACILITY

The referenced facility is located in the NE ¼ of the SE ¼ of the SW ¼ of Section 14, T30N, R1E, Vienna Township, Michigan. The Facility is located approximately 0.6 miles N-NW along Camp 8 Road, from it's intersection with M-32. Adjacent properties consist of predominantly of privately owned, large acreage, undeveloped properties

The referenced facility was permitted by Atlas Gas and Oil Company LLC, who effective April 19, 2011 became Chevron Michigan, LLC. On April 29, 2016, the company became Riverside.

Readily available aerials indicate that the Facility was constructed between 1992 and 1998. At the time of the initial construction ASTs in secondary containment and a second compressor with engine were associated with the Facility. The second compressor is no longer present in aerials dated August 2005, and the ASTs were removed between September 2013 and 2016.

Activities at the facility include separation of H2O from the stream using a dehydrator prior to compressing the gas for the pipeline. No crude or condensate is generated onsite. Water separated from the gas stream is put downwell for disposal. The gas stream associated with the facility is reported to be from Antrim Formation wells.

At the time of the inspection the Facility was found to be tidy, with no signs of leakage at or around the equipment.

Operational parameters for EUENGINE1 noted at the time of inspection included:

RPM	1300
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Engine Oil Pressure	54
Engine Oil Temp	193
Documented downtime for Month	0
Engine Hours	8549

PERMITS

Permits of record for the Facility include:

-PTI No.	Approved	Comment
18-10	February 1, 2010	Atlas Gas and Oil Company LLC

APPLICABILITY

Though not identified in the permit for the facility, the facility as an area source may be subject to federal Regulation. Subparts frequently associated with oil and gas facilities are identified below. Compliance with these subparts has not been determined as part of this inspection.

The referenced facility does not process or store petroleum liquids, nor store them onsite and is therefore appears to not be subject to 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subparts;

- K, Ka or Kb (Storage vessels for Petroleum Liquids);
- KKK (Equipment Leaks of VOC from onshore NG Processing Plants);
- VV (Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry);

In addition, the existing engine(s) has an installation date of 1993, which would make them not subject to NSPS Subparts IIII and JJJJ for Compression Ignition (CI) RICE and Spark Ignition (SI) RICE, respectively.

Subpart OOOO would apply to onshore affected facilities that are constructed, modified or reconstructed after August 23, 2011. Based on available information it appears that the referenced subpart is not applicable at this time but that future changes may be subject to the referenced subpart.

With respect to 40 CFR Part 63 (Maximum Achievable Control Technology Standards) the following Subparts may apply:

- Subpart HH (HAPS from Oil and NG Production Facilities)

·Subpart ZZZZ (RICE)

With respect to Subpart HH, the facility's glycol dehydrator is reported to not be subject to the subpart due to treated volumes below actual annual average thresholds. The facility also reports maintaining adequate records to demonstrate they are under applicable thresholds. A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD does not have authority to enforce the subpart.

With respect to Subpart ZZZZ, applicability is not based on year of installation, and it would appear that the permitted engine would be subject to the referenced Federal Regulations. It appears that any maintenance and recordkeeping requirements under the subpart have been incorporated into the PMMAP for the engine. A determination of compliance under the referenced subpart has not been made as part of this compliance determination AQD does not have authority to enforce the subpart.

EQUIPMENT

One building with a compressor and glycol dehydration system; and one disposal well are present onsite. The two 400-barrel ASTs with secondary containment present onsite at the time of permitting have been removed. Also present is the concrete footprint marking the location of a second compressor formerly associated with the site. Permitted equipment (EUs) onsite consists of:

EU	Description	Installation Date	Removal Date
EUDEHY	Glycol Dehydrator with process heater	September 1, 1993	NA
EUENGINE1 Unit 1054 SN 4EK02350 DOB 11/18/1998	CAT 3516, Low Emission (LE), 1265 Hp RICE	September 1, 1993	Wo July 27, 2020
EUENGINE1* Unit 1054 SN 4EK00626	CAT 3516 LE, 1265 HP	Wo July 27, 2020	NA

*Engine swing was like for like conducted in compliance with notification requirements of SC VII.1

In addition to the above referenced EUs, the ROP contains one FG in FGFACILITY.

The compressor/engine is equipped with an auto shut down and alarm for critical malfunctions. The engine is equipped with a muffler and an unobstructed stack that appeared to meet the maximum exhaust diameter of 12-inches and minimum height of 37.7 feet above ground level (Special Condition (SC) VIII.1).

COMPLIANCE

History –

No complaints are of record for the facility. Annual reporting of emissions under the MAERs Program is of record for the Facility since 2011.

Evaluation –

Compliance is being determined with respect to conditions associated with Permit No. 18-10. Permitted emission units are limited to EUDHY, EUENGINE1 as well as FGFACILITY. No compliance determination has been made with respect to 40 CFR Parts 60 and 63 subparts as delegation for area sources has not been received to date.

Process and operations –

At the time of the site inspection, District Staff noted that the site was well maintained; no staining or unexpected visible emissions were noted. The compressor was in operation at the time of the inspection. A steam plume was noted from the dehy stacks.

EUDEHY –

Permit conditions associated with EUDEHY are limited to a high-level citation that the EU shall meet the requirements of 40 CFR Part 63 Subpart HH (SC III.1). As well as monitoring and recordkeeping requirements to show that EUDEHY meets requirements which allow the EU to be exempt from the referenced subpart (VI.1 and VI.2 or VI.1 and VI.3).

Records provided by the Facility show that actual annual average flowrate for EUDEHY is less than 85K cubic meters/day threshold (equivalent to 3K Mcf/day) (SC VI.1) and those records provided were sufficient to show compliance with SCVI.2.

EUENGINE1 -

Permit 18-10 requires that no later than 60 days after the issuance of the permit, that a Preventative Maintenance/Malfunction Abatement Plan (PMAP) be submitted to the AQD District Supervisor for review and approval (SC III.1). A review of District Files identified a PMAP submitted by Atlas Energy Resources, LLC dated February 19, 2010 (received March 1, 2010) for the referenced facility. The referenced document was approved in AQD correspondence dated July 8, 2010. Based on a February 1, 2010, issuance date, the referenced PMAP was determined to be in compliance with the referenced condition. No previous document existed in the files and no revisions were identified in District Files.

SC III.2 limits operation of EUENGINE1 to no more than 200 hours per engine per year without the add-on control device. The EU does not have a pollution control device, therefore this SC as well as SCs associated with the monitoring and recordkeeping of operations without an add-on control device are not applicable. These SCs include IV.1 and VI.4.

SC IV.2 requires the permittee to install calibrate, maintain and operate satisfactorily a device to monitor the natural gas usage for EUENGINE1. SC IX.1 requires that the meter be installed within 120-days of issuance of the permit. A fuel gas meter has been installed and the readings recorded remotely. However, there is no way to verify the installation date which should have occurred on or before May 4, 2010.

Emissions –

SC I.1 & 2 limit NOx and CO emissions for EUENGINE1 to 60 and 30 tons/year based on a 12-month rolling average (respectively). Appendix A of 18-10 specifies that to determine NOX or CO emissions For EUENGINE1, the permittee shall use the emission factors from vendor

data or from source specific testing. A review of MAERs submittal since the previous site inspection indicates that emission calculations are consistent with Appendix A methods.

Calendar Year	NOx (TPY)	CO (TPY)
2020	22.46	21.34
2019	22.53	21.40
2018	19.35	18.39
Limit	60	30

Material Limits –

Under the referenced permit, the facility is restricted from burning sour NG as fuel. Where for some Facilities this restriction is found in EUENGINE1, for 18-10, the condition is found in FGFACILITY.

Monitoring & Record Keeping –

SC VI.1 requires the permittee to complete all required calculations in a format acceptable to the AQD District Supervisor and make them available the last day of the calendar month, for the previous month, unless specified otherwise in another permit condition. Records provided by the permittee appear to be in compliance with the referenced permit condition.

Under permit 18-10, the permittee is required to keep monthly fuel use records (SC VI.5) for EUENGINE1. Fuel usage for EUENGINE1 is monitored using a continuous fuel gas meter (SC VI.2) recorded monthly (SC VI.5) for use in determining monthly emissions of NOx and CO per Appendix A (SC VI.6 &7), in compliance with permit conditions.

Other recordkeeping under permit No. 18-10 includes a log of all maintenance activities conducted according to the PMAP (SC VI.3). Logs and spreadsheets for maintenance activity, engine down times and other activities were provided upon request and appear to be in general compliance with the permit.

Manual documentation of various readouts at the facility is conducted daily and is submitted to the corporate office at regular intervals. The above referenced information was provided in a timely manner in compliance with permit conditions. Copies may be found in district files.

Testing-

By request of the AQD District Supervisor, stack testing for NOX and CO (SC V.1) At the time of the inspection, engine testing has not been requested by the AQD District Supervisor, and SC V.1 is not applicable.

Reporting –

Under Permit 18-10, the permittee is required to notify AQD within 30-days should the engine be replaced and show that the alternate engine is equivalent or lower- emitting than the

previous engine (SC VIII.1). Available records indicate that proper notification in compliance with the permit condition was received for the engine swing that occurred July 22, 2020.

Other-

Other requirements of Permit 18-10 not already identified include correction of stack height to a minimum of 37.7 feet above ground within 120 days of the permit issuance (SC IX.2). A review of the file does not indicate when the corrections of stack heights was completed onsite, but stack heights did appear to be in compliance with the permit condition at the time of the August 27, 2021 site inspection.

FGFACILITY –

Special conditions associated with FG Facility includes restrictions on use of sour gas as a fuel (SC II.1) and verification on request of sulfur/hydrogen sulfide content of NG influent gas stream (SC V.1). Rule 199(i) defines sour gas as greater than a grain of Hydrogen Sulfide (16.5 ppm) per 100 standard cubic feet. The facility provided Draeger tube readings for the influent gas stream for July 7, 2021. The readings indicated a concentration of 1.5 ppm, well below the threshold for sour gas, and in compliance with permit conditions.

In addition, the FG contains a high-level citation with respect to 40 CFR Part 63, Subpart HH for dehydrations systems (SC III.1). As previously indicated, the Facility reports that NG thruput is below thresholds that would require compliance of EUDEHY with the referenced subpart.

Summary-

On August 27, 2021, AQD District Staff performed a scheduled site inspection at the Riverside Energy Group (Riverside), Vienna 14 CPF, located on Camp 8 Road, Vienna Township, Montmorency County, Michigan. SRN No. P0039. The facility is permitted under Permit to Install No. 18-10 issued on February 1, 2010. The purpose of the site inspection was to confirm operation of the facility in compliance with the referenced permit. The most recent site inspection was conducted on April 28, 2017, no compliance issues were noted.

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Based on the information obtained onsite and via the corporate office the facility appears to be in general compliance with permit conditions.

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Activities at the facility include separation of H2O from the stream using a dehydrator prior to compressing the gas for the pipeline. No crude or condensate is generated onsite. Water separated from the gas stream is put downwell for disposal. The gas stream associated with the facility is reported to be from Antrim Formation wells.

At the time of the inspection the Facility was found to be tidy, with no signs of leakage at or around the equipment.

Operational parameters for EUENGINE1 noted at the time of inspection included:

RPM	1300
Engine Oil Pressure	54
Engine Oil Temp	193
Documented downtime for Month	0
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PERMITS

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APPLICABILITY

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Sharon LeBlanc Digitally signed by Sharon LeBlanc
Date: 2021.09.01 10:38:34 -04'00'

Shane Nixon Digitally signed by Shane
Nixon
Date: 2021.09.08 12:40:43
-04'00'

NAME _____

DATE _____

SUPERVISOR _____