

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

P038936540

FACILITY: RIVERSIDE ENERGY MICHIGAN, LLC - TIMBERWOLF CPF		SRN / ID: P0389
LOCATION: T30N, R7E, SEC 29 SE NW SW, ALPENA		DISTRICT: Gaylord
CITY: ALPENA		COUNTY: ALPENA
CONTACT:		ACTIVITY DATE: 09/09/2016
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Minor source inspection		
RESOLVED COMPLAINTS:		

On September 9, 2016, I inspected the Timberwolf CPF. I found no violations.

This facility has no active permits. Permit 152-12 for a compressor engine was voided. According to a telephone note activity report by Gloria Torello, the engine under 152-12 was never installed. When Atlas (as it then was) decided not to go ahead with the new engine they voided the permit. They still had an existing engine operating; Gloria told them it was up to them to determine whether this met the permit exemption under Rule 285g, which exempts engines of under 10 million BTU per hour heat input from the requirement to obtain a Permit to Install.

According to Potential to Emit calculations, attached, the facility is a true minor source. Uncontrolled maximum emissions are 12.5 tons per year CO and 19.3 tons per year NOx.

The glycol dehydrator Potential to Emit is about 0.03 tons per year total VOCs. Dehydrators that emit less than approximately one ton of benzene per year are exempt from the more stringent pollution control requirements of the Glycol Dehydrator MACT, 40 CFR 63 Subpart HH. If all the VOC in the dehydrator's exhaust was benzene (which is not possible, but is a worst case scenario) the emissions would still be well under 1 ton per year. Therefore this dehydrator is exempt from the stringent control requirements of Subpart HH.

Dehydrators which process less than 85,000 standard cubic meters of natural gas per day are also exempt from the control requirements of Subpart HH. Riverside has provided a table, attached, which documents that the dehydrator meets the exemption this way as well.

When I arrived on site I met Mr. Steve Docherty of Riverside Energy, who was checking the site for the company. The engine on site has a catalytic oxidizer. Mr. Docherty showed me that the inlet temperature to the catalyst was 615 degrees f and outlet 630 degrees f. A temperature rise across the catalyst suggests that the catalyst is operating properly.

The engine was one medium Caterpillar natural gas fired compressor engine with catalytic oxidizer. Its stack was about 12 inches diameter and 32 feet high. There was no odor near the engine and no opacity in its exhaust.

There was a glycol dehydrator with a Wenco flame arrested burner rated at 200,000 BTU/hour. The burner vent was about 6 inches diameter by 24 feet high, unobstructed vertically upward. The still vent was about 2 inches diameter terminating in a T pipe fitting which served as a stack cap, about 24 feet above ground level. It had some "steam" opacity coming from it. I didn't smell any glycol odors near the dehydrator.

Tanks on site included two 400 barrel brine tanks piped to a salt water disposal well, all located inside a lined berm. Mr. Docherty remarked they only use one of the tanks, but the other is available as a backup if needed.

There were two 300 gallon drum on stilt tanks near the dehydrator, one labeled as methyl alcohol, one labeled as triethylene glycol. They were each over a lined wooden berm structure. Inside the compressor shed I saw two 300 gallon drum on stilt tanks; Mr. Docherty told me one was engine oil and one was compressor oil. There were also two larger cylindrical tanks marked waste oil tank resting on the floor.

I didn't see any stained soils which might suggest spills or leaks. I didn't smell any unusual odors. Maintenance appeared to be good.

NAME William J Rogers L

DATE 2016-SEP-14

SUPERVISOR 