

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

P055631698

FACILITY: NuEnergy Operating, Inc. (Zebulon 16 CPF)		SRN / ID: P0556
LOCATION: Clinton Twp., Section 16, COMINS		DISTRICT: Gaylord
CITY: COMINS		COUNTY: OSCODA
CONTACT: Jeff Smetzer, President		ACTIVITY DATE: 10/12/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE for 2016.		
RESOLVED COMPLAINTS:		

**SRN: P0556 Name: NuEnergy Operating, Inc. Zebulon 16 CPF**

**Directions:** The facility is located in Oscoda County, Clinton Township. From M-33, approximately 1 ½ miles south of the Montmorency/Oscoda County line, turn east onto Delano Road, at the T-in-the-road turn right on Tote Road, eventually the pavement resumes, travel south about 1 mile, turn left/east on Saddleback Road travel about 1 mile, on the left is a lake, turn right on Saddleback Trail, take road to the end. There is a locked gate. It is a short walk into the facility.

There is a map to the facility stapled to the blue permit file.

**Application:** This is an Antrim gas facility. The application includes the compressor engine, and a glycol dehydrator. The application describes the glycol dehydrator as exempt under Rule 282(b)(i) because the burner has a maximum heat input of less than 50,000,000 BTUs per hour.

**Permit.** On October 31, 2014, the AQD issued permit 157-14. The application included an uncontrolled natural gas fired compressor engine. The engine's PTE uncontrolled NOx emissions is 67.45 tpy. Because the permit allows engine replacement with an equivalent or lower emitting engine, including a higher emitting engine with control, permit 157-14 is an opt-out permit.

**Malfunction Abatement Plan (MAP):** On January 8, 2015 the AQD approved the MAP. The MAP includes:

- On CAT G3406 TA 4-stroke rich burn engines with no control or AFRC.

**MAERS:** Permit 157-14 was issued on October 31, 2014. In 2014 the engine operated two months. The related 2015 MAERS report showed EUENGINE emissions for the year were 6.9 tons NOx (68 tpy NOx permitted).

On 10/13/15 Dennis McGeen, AQD Lansing, confirmed the following for SRN P0556: MAERS flag is Yes so they will continue to report. Not a fee source.

**Records:** AQD requested and reviewed records including:

- Daily Compressor Operating Reports for the MAP,
- Natural gas usage (there is not a permit limit), and
- Monthly and 12-month rolling NOx and CO emissions.

Since this is a new permit, issued October 31, 2014, records start in November 2014, there is not a full year of records yet. A review of records from November 2014 to

**September 2015 shows:**

- 41.08 tons of NOx (68 tpy permitted); and
- 3.1 tons CO (6 tpy permitted).

The permittee demonstrated compliance with the permit's record keeping requirements.

**MACT:** This is an area source (minor for HAPs). The application included, the potential to emit HAPs is less than 10 tpy of any individual HAP and less than 25 tpy for total HAPs.

- The glycol dehydrator is subject to 40 CFR Part 63 Subpart HH.
- The compressor engine is subject to 40 CFR, Part 63, Subpart ZZZZ.

The EPA has not delegated these Subparts to MI AQD and the Subparts were not reviewed.

**MACES:**

- Facility Information and Facility Contacts were reviewed and no change was made.
- Regulatory Info, Summary, was reviewed and the following was added:
  - TV PTI was updated-HAPs was marked Minor.
- Regulatory Info, MACT Subject To, was reviewed and the following were added:
  - 40 CFR Part 63 Subpart HH,
  - 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 show no outstanding violation.

**Inspection:** On October 12, 2015 AQD staff visited the facility. It was operating. No visible emissions were observed on the engine stack. Three circular charts were noted, and two charts Put On Dates were: 10-9-15, 10/1/15. A clipboard near the engine included paperwork showing engine operating parameters including: RPMs, Engine JW Inlet and Outlet, Oil Pressure and Temperature. By visual assessment the stack on the engine appeared to meet the permit requirements of 6 inches maximum diameter, and a minimum of 32 feet above ground. On site are a glycol dehydrator, and separators. There are no large tanks on site, only two 55 gallon-ish tanks located in the engine building. On the walk into the facility is a pump jack that was operating and quiet, therefore thought to be run off electricity. The facility is very tidy and free of old parts and debris.

**Permit Conditions:**

**EUENGINE, Special Conditions (SC)**

SC I. 1 and 2; VI. 1, 4 and 5; V. 1. The to-date records show the NOx emissions are below the permitted 68 tpy, and CO emissions below 6 tpy. It is noted in November 2015 the facility will have operated one full year. AQD has not requested testing.

III. 1.; VI. 3. There is an AQD approved MAP on file, and the permittee keeps the required MAP records.

IV. 1; VI. 2. There is a device to monitor and record the natural gas usage for EUENGINE on a continuous basis. There is not a permit limit on natural gas usage.

VII. 1. There is nothing in the file regarding a notification of engine replacement.

VIII. By visual assessment the stack on the engine appeared to meet the permit requirements of 6 inches maximum diameter, and a minimum of 32 feet above ground.

**Conclusions:** Via onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 157-14.

NAME Gloria Janello

DATE 10-28-15

SUPERVISOR



