

Otsego

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

N627639963

FACILITY: HRF EXPLORATION & PRODUCTION		SRN / ID: N6276
LOCATION: T29N-R3W, Section 15, WATERS		DISTRICT: Gaylord
CITY: WATERS		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 05/26/2017
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY17 inspection and records review		
RESOLVED COMPLAINTS:		

Traveled to N6276 HRF Exploration & Production Services to determine compliance with PTI 220-97 as it came up in the FY17 inspection rotation.

The source is located in Otsego County, T29N-R3W, Section 15.

PTI 220-97 was voided 5/23/2003 based on equipment being exempt per Rule 285. It was unclear if the engine met Rule 278. The inspection was to determine if the equipment was still onsite and confirm the engine was exempt.

**Inspection:**

The building was signed as Enervest NMAG Facility, NE/4 of NE/4 of Section 15, T29N R3W, 989-705-2803.

The engine was operating and identified as NGCS 371, RPM was 1647. The engine onsite was a different engine than noted in the file as exempt. The engine appears to have control however the temperature gauges were not located, there was a muffler.

Inside the building were several contained drums and tanks for hydraulic and engine oil, and a dehy unit. A tank cement tank farm was located outside, less than 400 bbl.

No odors or VE present.

**Notes:**

Contacted Enervest to discuss:

1. This site was formerly owned by HRF.
2. This site is currently permitted under a different SRN N7488 and has a permit. The permit history is described below.
3. Currently installed onsite, per email from Lisa Harriger (ECT) and Jeff Riling (Enervest), is a Cat 3408 425 hp engine, which is a different engine than permitted under 129-05A. Records were provided that demonstrated the engine is exempt per 285(g) and under significant levels of 278. PTI 129-05A does have an engine change out condition, which allows for the change out without notification to DEQ because it is exempt per 285(2)(g). The change out condition is as follows:  
**VII. REPORTING, VII.1:** Except as provided in R 336.1285, if the engine is replaced with an equivalent-emitting or lower-emitting engine, the permittee shall notify the AQD District Supervisor of such change-out and submit acceptable emissions data to show that the alternate engine is equivalent-emitting or lower-emitting. The data shall be submitted within 30-days of the engine change out. (R 336.1205, R 336.1702(a), R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))
4. Although the current engine for N7488 PTI 129-05A is exempt, Enervest notified AQD that they would like to continue to keep PTI 129-05A open and not void it. They will continue to report to MAERS, because the switch-out condition requires them to be a opt out source.

**PTI History:**

- N6276 HRF PTI 220-97 issued 6/17/97 MOGA permit for a DPC 360, 360 HP; **voided 4/15/03** (exempt 285(g)), also notes saying this engine was replaced with Cat 3516
- HRF sold to Enervest.
- Enervest applied for permit for replacement engine. Received new SRN (N7488).
- N7488 Enervest PTI 129-05 issued 9/1/05 for a Cat 398TA 700 hp (replaces a Cat 3516); **voided 12/20/11**

- N7488 Enervest PTI 129-05A issued 12/20/11 for a Cat 3408TA 400 hp (replaces Cat 398TA 700 hp)
- As of 5/24/17, the existing engine is exempt (Cat 3408 425 hp) however the company will not request to void at this time.

**Conclusions:**

N6276 HRF PTI 220-97 is currently void, and should be removed from the inspection list. It will be noted in MAERS as 'permanently closed' as that SRN is no longer valid. The description was updated.

N7488 Enervest PTI 129-05A has an exempt engine however continues to operate with current PTI.

NAME Becky RadulskiDATE 5/26/17SUPERVISOR SN